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14 ATTORNEYS FOR PLAINTIFFS
AND PROPOSED CLASS

15
16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION
19

20 MARILYN SAHAGUN LOPEZ; GIOVANNA
RAMIREZ-HERNANDEZ; LASONYA WELLS;
21 SALLY BATES; VICTORIA CHEW; JAZMIN
MENDEZ; LISA GONZALES; ADRIANA
22 GONZALEZ OCHOA; ALEXCIS HERRERA;
LACARLA CARR; SILVIA MONTOYA;
23 DAMENA PAGE; COURTNEY BOSSE;
CANTRAIL MURPHY; DEPHINA SYKES;
24 TAYLOR ROSS; JAYLA GLASER; MARY
O'NEAL; MELISSA PERNA; SARAH WALLS,
25 individually and on behalf of all others similarly
situated,
26 Plaintiffs,

27 v.

28 CITY AND COUNTY OF SAN FRANCISCO;
SAN FRANCISCO SHERIFF'S OFFICE; PAUL

Case No.: _____

**CLASS ACTION
CLASS ACTION COMPLAINT FOR
DAMAGES, DECLARATORY AND
INJUNCTIVE RELIEF, AND DEMAND FOR
JURY TRIAL**

Claims:

1. 42 U.S.C. § 1983 - Fourth Amendment (Unreasonable Search)
2. 42 U.S.C. § 1983 - Fourteenth Amendment (Substantive Due Process)
3. 42 U.S.C. § 1983 - Equal Protection (Sex Discrimination)
4. 42 U.S.C. § 1983 - Eighth Amendment (Cruel and Unusual Punishment, alternative)

<p>1 MIYAMOTO, in his individual and official capacity as Sheriff; KATHERINE JOHNSON, in her 2 individual and official capacity as Undersheriff; 3 SERGEANT IBARRA (first name unknown); 4 DEPUTY DOCKERY (first name unknown); DEPUTY 5 NG (first name unknown); DEPUTY 6 MUSTOS (first name unknown); and DOES 7 101-500, inclusive, 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28</p> <p style="text-align: center;">Defendants,</p>	<p>5. 42 U.S.C. § 1983 - First Amendment (Retaliation) 6. 42 U.S.C. § 1983 - Monell and Supervisory Liability 7. Cal. Const., art. I, § 1 (Right to Privacy) 8. Cal. Const., art. I, § 13 (Unreasonable Search and Seizure) 9. California Civil Code § 52.1 (Bane Act) 10. California Civil Code § 52.4 (Gender Violence) 11. Battery 12. Intentional Infliction of Emotional Distress</p> <p>DEMAND FOR JURY TRIAL</p>
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INTRODUCTION

1. This is a federal and state civil rights class action brought by women detained at San Francisco County Jail Number 2 (“SFCJ No. 2”). The twenty named Plaintiffs are among an unknown but potentially substantial number of women subjected to these practices: women who were strip-searched before May 22, 2025, women who were strip-searched during the mass operation on May 22, 2025, and women who were subjected to suspicionless post-movement strip searches in the months that followed. The practices challenged here were not limited to a single day or a single cohort of women. They were imposed on every woman who passed through SFCJ No. 2’s women’s housing unit and was subjected to the search protocols that SFSO maintained before, during, and after May 22. Plaintiffs challenge a pattern and practice of deliberately degrading, suspicionless, cross-gender strip and visual body cavity searches; the unauthorized activation of body-worn cameras (“BWC”) during those searches for no legitimate security purpose; the systematic denial of menstrual hygiene following forced disrobing; the coercive weaponization of strip searches as punishment and retaliation; and the deliberate positioning of male deputies to observe women’s naked bodies during searches. The violations are not accidental. They are systemic, institutionally sanctioned, and directed at a captive population of women who cannot escape or refuse.

2. On May 22, 2025, San Francisco Sheriff’s Office (“SFSO”) supervisors and deputies descended on B Pod at SFCJ No. 2 in coordinated formation. Approximately twelve deputies, including male deputies, corralled all women in the pod into the common area under armed guard,

1 holding them there as a controlled group while individual women were selected and compelled to
2 strip naked, expose their genitalia, lift their breasts, spread their buttocks, squat, and cough. The
3 male deputies present were not there by accident, were not unaware of what was occurring, and did
4 not look away. They were stationed throughout the pod, including in positions with direct sightlines
5 into the search area, to serve as human barriers and observers. This was not incidental, inadvertent,
6 or casual: it was deliberate.

7 3. The deliberateness of the cross-gender exposure is beyond dispute. Multiple plaintiffs heard
8 Sergeant Ibarra, the supervising officer, explicitly instruct Deputy Dockery not to deactivate her
9 body-worn camera during the searches. When Dockery asked whether she should turn her camera
10 off, Ibarra said no. Ibarra later told detainees the footage might be “used for training purposes.” He
11 told women the footage was similar to what they “see on YouTube” and was “just like cops.” He
12 told women that their genitalia would be “blurred” before the footage was released publicly-
13 indicating not only that footage existed, but that Ibarra contemplated public distribution of images
14 of naked women. These statements confirm that supervisors knew recording was occurring during
15 intimate searches and deliberately chose to allow it. These facts categorically distinguish this case
16 from cases in which courts have found male viewing to be accidental or incidental.

17 4. The violations extended beyond May 22, 2025. In the weeks and months that followed,
18 women continued to be subjected to strip searches following court appearances, medical
19 appointments, and family visitation, without individualized suspicion, even when they had been
20 continuously supervised and physically restrained throughout their movement. A subsequent search
21 in June 2025 was described by one plaintiff as an “orifice search” far exceeding any legitimate
22 security protocol. In July 2025, deputies used flashlights to illuminate the interior of women’s
23 vaginas. A deputy involved in the May 22 operation later approached a plaintiff and groped her
24 breast while making degrading sexual comments. Deputy Ng routinely stared at women in the
25 showers.

26 5. Women who complained or organized others to file grievances were retaliated against. After
27 plaintiffs LaSonya Wells and Alexcis Herrera organized other women to file tort claims, both were
28 placed in segregation within a week. Sergeant Ibarra directly threatened continued strip searches in

1 November 2025 unless women ceased what he called “disrespecting deputies.” These reprisals were
2 predictable, coordinated, and intended to silence women who exercised their right to seek redress.

3 6. Defendants carried out these practices pursuant to official policy, longstanding custom, and
4 supervisory ratification. Sheriff Paul Miyamoto, as the final policymaker for SFSO, is responsible
5 for all policies, practices, customs, and failures of training at SFCJ No. 2. Plaintiffs seek
6 compensatory and punitive damages, declaratory relief, injunctive relief mandating constitutional
7 compliance, and attorneys’ fees and costs.

8 **JURISDICTION AND VENUE**

9 7. This Court has original jurisdiction under 28 U.S.C. sections 1331 and 1343(a)(3)-(4)
10 because this action arises under 42 U.S.C. sections 1983 and 1988 and the Fourth, Eighth, and
11 Fourteenth Amendments to the United States Constitution.

12 8. This Court has supplemental jurisdiction over Plaintiffs’ state law claims pursuant to 28
13 U.S.C. section 1367(a) because those claims form part of the same case or controversy as the federal
14 claims.

15 9. Venue is proper in this District under 28 U.S.C. section 1391(b)(1)-(2). All Defendants
16 reside or maintain principal offices in the City and County of San Francisco. All acts and omissions
17 giving rise to this action occurred at SFCJ No. 2, located at 425 7th Street, San Francisco, California
18 94103, within this District.

19 **PARTIES**

20 A. Plaintiffs

21 10. Plaintiff MARILYN SAHAGUN LOPEZ was a pretrial detainee at SFCJ No. 2 on and after
22 May 22, 2025. On May 22, 2025, she was subjected to the mass strip search described herein. Deputy
23 Mustos conducted her search. Male deputies were deliberately stationed in positions where they
24 could see into the search area and directly observe her naked body. After she filed a grievance
25 regarding the strip search, she was removed from her job assignment in retaliation. She was also
26 required to comply with orders not to use bathroom facilities during the search, causing her to
27 develop a urinary tract infection. Mustos subsequently made repeated, unsolicited sexual comments
28 about her anatomy and groped her breast.

1 11. Plaintiff GIOVANNA RAMIREZ-HERNANDEZ was a pretrial detainee at SFCJ No. 2 on
2 and after May 22, 2025. She was searched by Deputy Dockery with Dockery’s BWC activated. She
3 heard Sergeant Ibarra tell Dockery not to deactivate her camera. Following the May 22 search,
4 deputies changed her pat-down procedures from female deputies to male deputies in retaliation. She
5 made a complaint about a fellow detainee who sexually harassed her; the supervising deputy
6 disclosed her complaint to the harasser. Deputy Ng routinely stared at her and other women while
7 they were showering.

8 12. Plaintiff LASONYA WELLS was a pretrial detainee at SFCJ No. 2 on and after May 22,
9 2025. She was searched by Deputy Dockery with Dockery’s BWC activated. She was menstruating
10 at the time and was forced to remove her tampon; deputies did not provide a replacement. She and
11 plaintiff Alexcis Herrera organized other women to file government tort claims. Within
12 approximately one week, both she and Herrera were placed in administrative segregation in direct
13 retaliation. She independently heard Sergeant Ibarra instruct Dockery not to deactivate her camera.

14 13. Plaintiff SALLY BATES was a pretrial detainee at SFCJ No. 2 on and after May 22, 2025.
15 She was subjected to the May 22, 2025 strip search by Deputy Dockery with Dockery’s BWC
16 activated. She witnessed the retaliatory placement of plaintiffs Marilyn Sahagun Lopez and Victoria
17 Chew in segregation following their grievances. She also observed plaintiffs LaSonya Wells and
18 Alexcis Herrera placed in segregation following their organization of tort claim filings.

19 14. Plaintiff VICTORIA CHEW was a pretrial detainee at SFCJ No. 2 on May 22, 2025. She
20 was subjected to the mass strip search by a deputy described as a “rookie” whose BWC was
21 activated. Sgt. Ibarra told women after the search that the footage was going to be “used for training
22 purposes” and that genitals would be “blurred out.” Some deputies joked that the footage was or
23 would be posted to YouTube. Shortly after filing a grievance, plaintiff Chew was placed in
24 segregation without justification.

25 15. Plaintiff JAZMIN MENDEZ was a pretrial detainee at SFCJ No. 2 on and after May 22,
26 2025. She was subjected to the May 22, 2025 strip search and believes she was recorded. She had
27 previously been transferred to C Pod when she asked for water, and was strip searched upon that
28 transfer. She was menstruating and asked for sanitary pads; deputies told her they had none. She

1 witnessed a detainee who had spoken about filing a lawsuit transferred to segregation. She continues
2 to experience nightmares related to the strip search and is currently on medication for trauma-related
3 symptoms.

4 16. Plaintiff LISA GONZALES was a pretrial detainee at SFCJ No. 2 on and after May 22, 2025.
5 She was subjected to the May 22, 2025 strip search and believes Deputy Paulos recorded her. She
6 was subjected to a substantially more invasive search on June 17, 2025, which she described as an
7 “orifice search” involving penetrating examination far exceeding any recognized security protocol.
8 She was also subjected to repeated strip searches before the pandemic for possessing gel pens or
9 having tablets activated. Sgt. Ibarra told her and other women in November 2025 that strip searches
10 would continue “if they kept disrespecting deputies.” After a press conference regarding the
11 searches became public, deputies placed Narcan signs at the tops of shower stalls to obstruct the
12 view of women showering.

13 17. Plaintiff ADRIANA GONZALEZ OCHOA was a pretrial detainee at SFCJ No. 2 on and
14 after May 22, 2025. She was subjected to the May 22, 2025 strip search and observed her deputy’s
15 BWC indicator light “blinking red.” Following the searches, she observed that Giovanna Ramirez-
16 Hernandez was “frantic” about being recorded. Plaintiff Ochoa was subjected to approximately four
17 additional strip searches following May 22. She believes those searches were selective-limited to
18 women who had filed grievances about May 22-and constituted deliberate retaliation.

19 18. Plaintiff ALEXCIS HERRERA was a pretrial detainee at SFCJ No. 2 on and around May
20 22, 2025. She was present in the pod during the May 22 search and witnessed the searches of others.
21 She heard Deputy Dockery ask Sergeant Ibarra whether to deactivate her BWC and heard Ibarra say
22 no. During a walkthrough the following day, she told Ibarra that some women had been recorded;
23 Ibarra responded that the footage would be like “YouTube” or “cops.” She and plaintiff LaSonya
24 Wells organized other women to file government tort claims. Within approximately one week,
25 deputies placed both Wells and Herrera in administrative segregation.

26 19. Plaintiff LACARLA CARR was a pretrial detainee at SFCJ No. 2 on and after May 22, 2025.
27 She was subjected to the May 22, 2025 strip search and could observe other deputies present. She
28 heard Sergeant Ibarra tell Dockery not to deactivate her camera and heard the statement that footage

1 “would be erased later.” She was menstruating during the May 22 search and was required to remove
2 her sanitary pad. She was subjected to an additional search in June 2025, and in July 2025 was
3 subjected to a search during which a deputy used a flashlight to illuminate the interior of her vagina.
4 She observed that whenever strip searches occurred, a deputy entered the pod carrying a long
5 firearm.

6 20. Plaintiff SILVIA MONTOYA was a pretrial detainee at SFCJ No. 2 on and after May 22,
7 2025. She was subjected to the May 22, 2025 strip search by Deputy Dockery with Dockery’s BWC
8 activated. She had been subjected to strip searches approximately every two months before May 22.
9 On October 15, 2025, she was subjected to a pat-down search in a hallway by four male deputies
10 following a visit with her grandchildren. In early December 2025, deputies confiscated her rings
11 and the rings of other named plaintiffs without justification. In June 2025, she, Marilyn Sahagun
12 Lopez, and Giovanna Ramirez-Hernandez were removed from their kitchen work assignments in
13 retaliation.

14 21. Plaintiff DAMENA PAGE was a pretrial detainee at SFCJ No. 2 on and after May 22, 2025.
15 She was subjected to the May 22, 2025 strip search with BWCs recording. She asked whether she
16 was being recorded and was told the recording “was not going to be used for people to view it.” She
17 asked deputies to deactivate their cameras; they refused. After she filed her own government tort
18 claim, she was placed in administrative segregation.

19 22. Plaintiff COURTNEY BOSSE was a pretrial detainee at SFCJ No. 2 on May 22, 2025. She
20 was subjected to the May 22, 2025 strip search. The deputy who conducted her search did not have
21 her own BWC activated, but other deputies present had their BWCs activated and pointed toward
22 the search area. She overheard Sergeant Ibarra state that the footage would be erased later. Following
23 the public press conference disclosing the searches, plaintiff Bosse and other women who had been
24 working in the kitchen were removed from those work assignments.

25 23. Plaintiff CANTRAIL MURPHY was a pretrial detainee at SFCJ No. 2 on May 22, 2025.
26 She was subjected to the May 22, 2025 strip search and was subsequently subjected to additional
27 strip searches.

28 24. Plaintiff DEPHINA SYKES was a pretrial detainee at SFCJ No. 2 on May 22, 2025. She

1 was subjected to the May 22, 2025 strip search by a deputy whose BWC appeared to be activated,
2 with the indicator light visible. She observed indicator lights on the BWCs of other deputies walking
3 through the pod. She was afraid to file complaints due to prior adverse experiences in the
4 correctional system.

5 25. Plaintiff TAYLOR ROSS was a pretrial detainee at SFCJ No. 2 on and after May 22, 2025.
6 She was subjected to the May 22, 2025 strip search and had been subjected to multiple strip searches
7 before and after May 22. In early September 2025, she gave birth. During her hospitalization for
8 delivery, male SFSO deputies repeatedly entered her hospital room while she was receiving pelvic
9 examinations and while she was breastfeeding her newborn son. Medical personnel explicitly asked
10 the deputies to leave; the deputies refused, stating they were required to maintain a line of sight per
11 SFSO policy. This policy caused plaintiff Ross to be involuntarily observed by male deputies during
12 pelvic exams and breastfeeding.

13 26. Plaintiff JAYLA GLASER was a pretrial detainee at SFCJ No. 2 on May 22, 2025. She was
14 subjected to the May 22, 2025 strip search and observed deputies on the upper tier with sightlines
15 to the search area. She was menstruating at the time and was not provided a replacement sanitary
16 pad after being required to remove her pad. Deputies told her she would receive clean underwear
17 following the search; she did not, and subsequently bled through the underwear she was wearing.

18 27. Plaintiff MARY O'NEAL was a pretrial detainee at SFCJ No. 2 on and around May 22,
19 2025. She was subjected to the May 22, 2025 strip search and to a prior strip search before a hospital
20 psychiatric transport. She observed that plaintiff LaSonya Wells was subjected to a strip search
21 following a visit by O'Neal.

22 28. Plaintiff MELISSA PERNA was a pretrial detainee at SFCJ No. 2 on and after May 22,
23 2025. She was subjected to the May 22, 2025 strip search and was searched while another inmate
24 was searched in the bathroom at the same time. At one point during the strip search while she was
25 completely naked, a deputy walked an inmate directly in front of her to search the other inmate in
26 the adjacent stall. She was subjected to subsequent strip searches after filing a government claim
27 against the City and noted that the women who also filed government claims were routinely
28 subjected to strip searches after making their complaints as well.

1 29. Plaintiff SARAH WALLS was a pretrial detainee at SFCJ No. 2. She was subjected to a strip
2 search upon return from federal court in August 2025, with a BWC activated and without privacy,
3 in conditions observable to others. She brings this action as a member of the proposed BWC
4 Recording Subclass and Post-Movement Strip Search Subclass.

5 B. Defendants

6 30. Defendant CITY AND COUNTY OF SAN FRANCISCO (“CCSF”) is a public entity
7 organized and existing under California law. CCSF operates SFCJ No. 2 through the San Francisco
8 Sheriff’s Office and is responsible for all policies, customs, practices, training, supervision, and
9 discipline of personnel who operate the jails.

10 31. Defendant SAN FRANCISCO SHERIFF’S OFFICE (“SFSO”) is the law enforcement and
11 custodial agency directly responsible for the operation of SFCJ No. 2, including strip search
12 procedures, body-worn camera protocols, menstrual hygiene distribution policies, and disciplinary
13 processes.

14 32. Defendant PAUL MIYAMOTO is and was at all relevant times the duly elected Sheriff of
15 the City and County of San Francisco and a final policymaker for the SFSO. He is sued in his
16 individual and official capacities.

17 33. Defendant KATHERINE JOHNSON is and was at all relevant times the Undersheriff of the
18 San Francisco Sheriff’s Office, a position she has held since September 2022. Johnson has served
19 with the SFSO since March 1996, working directly in County Jail Number 2 and County Jail
20 Number 4, and has held key executive positions including Chief Deputy, Chief of Staff, and
21 Assistant Sheriff across multiple Sheriff administrations. As Undersheriff, Johnson is the second-
22 highest ranking official in the SFSO and bears direct operational responsibility for the custody
23 operations of SFCJ No. 2, including the formulation, implementation, supervision, and enforcement
24 of strip search procedures, body-worn camera policies, detainee movement protocols, and hygiene
25 distribution practices. Plaintiffs are informed and believe and thereon allege, based on information
26 from a source with direct knowledge of SFSO operations, that Undersheriff Johnson designed,
27 directed, implemented, or ratified the strip search policies and practices challenged herein, and that
28 the May 22, 2025 mass strip search operation and the post-movement search practices described in

1 this Complaint were carried out pursuant to policies and customs that Johnson originated,
2 authorized, or approved. As a functional final policymaker for SFSO custody operations, Johnson's
3 decisions and ratifications are attributable to the City and County of San Francisco under Monell.
4 She is sued in her individual and official capacities.

5 34. Defendant SERGEANT IBARRA (first name unknown) was at all relevant times a
6 supervisory sergeant at SFCJ No. 2. He personally directed deputies during the May 22, 2025
7 operation, explicitly instructed Deputy Dockery not to deactivate her BWC during strip searches,
8 made statements to detainees minimizing and threatening the consequences of their having been
9 recorded, and threatened continued searches against women who complained. He is sued in his
10 individual and official capacities.

11 35. Defendant DEPUTY DOCKERY (first name unknown) conducted strip and visual body
12 cavity searches of multiple plaintiffs during the May 22, 2025 operation with her body-worn camera
13 activated, pursuant to Sergeant Ibarra's explicit instruction. She is sued in her individual capacity.

14 36. Defendant DEPUTY NG (first name unknown) routinely entered women's shower areas and
15 stared at women while they were bathing. He is sued in his individual capacity.

16 37. Defendant DEPUTY MUSTOS (first name unknown) conducted strip searches of female
17 plaintiffs and subsequently made degrading sexual comments to plaintiff Marilyn Sahagun Lopez
18 about her anatomy and groped her breast. He is sued in his individual capacity.

19 38. Plaintiffs are ignorant of the true names and capacities of defendants sued as DOES 101
20 through 500, inclusive, and will amend this Complaint to allege their true names when ascertained.
21 At all relevant times, each individual defendant acted under color of state law, within the course and
22 scope of employment or official duty.

23 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

24 39. Plaintiffs who are or were pretrial detainees at SFCJ No. 2 have presented timely and proper
25 government tort claims to CCSF pursuant to California Government Code section 910 et seq. All
26 applicable claims periods have been satisfied or are tolled by Defendants' ongoing retaliatory and
27 coercive conduct, the discovery rule, equitable tolling, or other applicable doctrine.

28 40. Plaintiffs' federal civil rights claims under 42 U.S.C. section 1983 are not subject to the

1 exhaustion requirement of the Prison Litigation Reform Act, 42 U.S.C. section 1997e(a), insofar as
2 Plaintiffs were and are pretrial detainees rather than convicted prisoners within the meaning of that
3 statute.

4 **FACTUAL ALLEGATIONS**

5 A. Background: The Women’s Housing Unit at SFCJ No. 2

6 41. SFCJ No. 2, located at 425 7th Street, San Francisco, California, is operated by the SFSO
7 and houses both pretrial detainees and convicted persons. It is the only San Francisco County Jail
8 that houses women. B Pod is the women’s housing unit that was the site of the May 22, 2025 mass
9 strip search.

10 42. Women detained at SFCJ No. 2 are held in a facility where their physical movements, bodily
11 functions, and access to privacy are entirely subject to the discretion of SFSO personnel. They
12 cannot refuse strip searches without facing disciplinary consequences. They cannot protect
13 themselves from observation by male deputies. They cannot obtain menstrual hygiene products
14 without requesting them from the same deputies who search them. They cannot leave. Their
15 vulnerability to abuse of authority is structural and absolute.

16 B. The May 22, 2025 Mass Strip Search: Intentional Cross-Gender Observation and Deliberate
17 Recording

18 43. On May 22, 2025, at approximately 7:30 a.m., Sergeant Ibarra led approximately twelve
19 SFSO deputies, including male deputies, into B Pod at SFCJ No. 2 in coordinated formation. The
20 deputies positioned themselves throughout the pod and ordered all women in the unit to leave their
21 cells and assemble in the common area.

22 44. Under armed supervision, the women were held in the common area while individual women
23 were selected one by one and directed to enter a search area. No individualized reasonable suspicion
24 supported the selection of any woman for search. No specific threat or security event justified the
25 operation. The searches were mass, suspicionless, and random.

26 45. Women were ordered to remove all clothing, including bras and underwear. They were then
27 commanded to lift their breasts, spread their buttocks, squat, and cough, exposing all intimate body
28 parts for visual inspection.

1 46. The presence of male deputies during the searches was not accidental, inadvertent, or the
2 result of unanticipated circumstance. Male deputies were strategically positioned throughout B Pod
3 as partitions - deliberately placed so that they had direct sightlines into the area where women were
4 being searched. Plaintiff Marilyn Sahagun Lopez states that the male deputies were the partitions,
5 positioned specifically so that they could see into the search area. Deputies were stationed on the
6 staircase, the upper tier, and in positions throughout the pod with direct visual access to women
7 undergoing intimate searches. They did not look away.

8 47. The body-worn cameras worn by Sergeant Ibarra, Deputy Dockery, and other deputies
9 present in B Pod were activated and recording during the searches. Multiple plaintiffs observed that
10 cameras were on and pointed toward the search area. Plaintiff Giovanna Ramirez-Hernandez
11 observed that Dockery's camera was activated throughout the search. Plaintiff Sally Bates
12 confirmed she was searched by Dockery with the camera on. Plaintiff Adriana Gonzalez Ochoa
13 observed that the recording indicator light on her searching deputy's camera was "blinking red."
14 Plaintiff Damena Page asked deputies to deactivate their cameras; they refused.

15 48. The activation of body-worn cameras during strip searches was deliberate and supervisory.
16 Plaintiffs Giovanna Ramirez-Hernandez, LaSonya Wells, Alexcis Herrera, LaCarla Carr, and
17 Courtney Bosse each independently state that Deputy Dockery asked Sergeant Ibarra during the
18 operation whether she should deactivate her body-worn camera, and that Ibarra explicitly said no.
19 This refusal is direct evidence of supervisory intent to capture women's naked bodies on digital
20 recording equipment while they were under compelled nudity.

21 49. Sergeant Ibarra made additional statements confirming his awareness and approval of the
22 recording. He told women the footage would be "used for training purposes." He told women the
23 footage was "just like YouTube" and "just like cops." He told women that their genitalia would be
24 "blurred" before footage was publicly released - not as a reassurance, but as confirmation that
25 footage existed and that he was contemplating its public distribution. Plaintiff Victoria Chew reports
26 that deputies joked the footage was already or would be posted to YouTube. These statements, made
27 to women who had just been compelled to stand naked under guard, constitute explicit threats.

28 50. Women who were menstruating were not exempted from the searches and received no basic

1 medical dignity. Plaintiff LaSonya Wells was forced to remove her tampon without replacement.
2 Plaintiff LaCarla Carr was required to remove her sanitary pad; no replacement was confirmed.
3 Plaintiff Jayla Glaser was not provided a replacement pad and subsequently bled through her
4 underwear while waiting for supplies. Plaintiff Jazmin Mendez requested pads; deputies said they
5 had none.

6 51. Following the searches, women were not provided clean replacement undergarments. The
7 failure to restore basic sanitary conditions after forcing women to strip naked compounded the
8 humiliation and created objectively unsanitary conditions.

9 C. The Pattern Continues: Additional Unlawful Searches After May 22, 2025

10 52. The May 22, 2025 operation was not isolated. It was the most visible and thoroughly
11 documented manifestation of a broader institutional practice of suspicionless and retaliatory strip
12 searches imposed on women at SFCJ No. 2 before and after May 22, 2025. It reflects an entrenched
13 pattern and practice of suspicionless, degrading, and invasive searches that predates and continues
14 after May 22. The searches before May 22, the mass operation on May 22, and the escalating
15 invasive searches in the months that followed are not discrete events: they are evidence of a single,
16 centralized, supervisory-authorized institutional practice, repeated across time, personnel, and
17 occasions, and therefore susceptible to common proof.

18 53. On June 17, 2025, plaintiff Lisa Gonzales was subjected to an “orifice search” - a penetrating
19 internal examination significantly more invasive than a visual body cavity search and far beyond
20 any protocol justifiable without a warrant or probable cause.

21 54. In July 2025, plaintiff LaCarla Carr was subjected to a search during which a deputy used a
22 flashlight to illuminate the interior of her vagina. This constitutes a physical, penetrating
23 examination conducted without a warrant, without probable cause, and without any individualized
24 basis.

25 55. Plaintiff Sarah Walls was subjected to a strip search upon return from federal court in August
26 2025, with a BWC activated and in conditions observable to others who were not participants in the
27 search.

28 56. Plaintiff Taylor Ross was pregnant at SFCJ No. 2 and gave birth in early September 2025.

1 During her hospitalization, male SFSO deputies entered her hospital room on multiple occasions
2 while she was receiving pelvic examinations and while she was breastfeeding her newborn son.
3 Medical professionals asked the deputies to leave; they refused and cited SFSO policy. This policy
4 subjected plaintiff Ross to compelled observation by male deputies during pelvic exams and
5 breastfeeding – some of the most medically intimate experiences of her life.

6 57. Women returning from visits with family members were subjected to strip searches
7 regardless of whether they had been under continuous SFSO supervision throughout their visits.
8 Plaintiff Silvia Montoya was subjected to a pat-down search in a hallway by four male deputies
9 following a visit with her grandchildren on October 15, 2025. Women were also strip searched
10 following supervised medical appointments, even when they had been restrained and directly
11 supervised throughout their movement.

12 D. Sexual Harassment and Physical Misconduct by Deputies

13 58. Deputy Mustos, who searched plaintiff Marilyn Sahagun Lopez during the May 22, 2025
14 operation, subsequently made repeated unsolicited references to her sexual anatomy, asked her
15 about her sex toys, groped her breast, and made degrading remarks about the appearance of her
16 body. This conduct occurred following her participation in her strip search and reflected her
17 awareness of her naked body from that search.

18 59. Deputy Ng routinely entered areas of SFCJ No. 2 where women were showering and stared
19 at them while they bathed. Plaintiff Giovanna Ramirez-Hernandez specifically described Ng staring
20 at women in the showers. This conduct reflects SFSO’s failure to implement or enforce any
21 meaningful prohibition on male deputies observing women’s naked bodies.

22 E. Systematic Retaliation Against Women Who Complained

23 60. Following the May 22, 2025 operation, multiple plaintiffs filed grievances, submitted
24 government tort claims, or participated in organizing other women to exercise their rights.
25 Defendants responded with a coordinated and systematic pattern of retaliation:

26 61. Plaintiffs LaSonya Wells and Alexcis Herrera organized women in B Pod to file government
27 tort claims, explained the process, and assisted others. Within approximately one week of this
28 advocacy, deputies placed both Wells and Herrera in administrative segregation without

1 documented justification.

2 62. Plaintiff Marilyn Sahagun Lopez complained about the strip search and was removed from
3 her work assignment in retaliation.

4 63. Plaintiff Victoria Chew filed a grievance and was placed in segregation shortly thereafter,
5 without paperwork or explanation.

6 64. Plaintiff Damena Page filed her own government tort claim and was placed in segregation
7 thereafter. She states that “ones who spoke up are being targeted.”

8 65. Plaintiff Jazmin Mendez personally witnessed another detainee transferred to segregation
9 after she spoke openly about filing a lawsuit. Mendez reports that if women “spoke up” they were
10 placed in cells with only a small bathroom and left there for five to six hours.

11 66. Plaintiffs Adriana Gonzalez Ochoa and Melissa Perna were subjected to approximately four
12 additional strip searches following May 22. They believe the searches were focused on women who
13 had filed grievances-constituting targeted retaliation.

14 67. Sergeant Ibarra told plaintiff Lisa Gonzales and other women in November 2025 that strip
15 searches would continue “if they kept disrespecting deputies and not listening to what they told them
16 to do.” This statement conditioned the cessation of future searches on detainees’ silence and
17 compliance, constituting both coercion and a direct chilling of First Amendment-protected activity.

18 68. Following a press conference at which the searches were publicly disclosed, plaintiffs
19 Courtney Bosse, Silvia Montoya, Marilyn Sahagun Lopez, and Giovanna Ramirez-Hernandez were
20 all removed from their kitchen work assignments. Deputies also posted Narcan signs at the tops of
21 women’s shower stalls following the press conference, an apparent attempt to obstruct visibility into
22 areas where women’s naked bodies could be observed-confirming SFSO’s awareness that
23 unauthorized observation had been occurring.

24 F. Supervisory Awareness and Municipal Policy

25 69. The violations described herein were not unauthorized deviations from SFSO policy. They
26 were conducted by supervisory personnel, directed by a sergeant, and carried out pursuant to
27 longstanding customs and practices of the SFSO. Sergeant Ibarra’s explicit instruction to Deputy
28 Dockery not to deactivate her BWC during intimate searches, his subsequent statements minimizing

1 and threatening women with recorded footage, and his direct retaliatory threats are direct evidence
2 of supervisory authorization.

3 70. The SFSO has known of and failed to remedy cross-gender strip search practices for years,
4 and Undersheriff Johnson has held senior executive positions at SFSO-including Chief Deputy and
5 Assistant Sheriff-throughout the period during which those practices persisted. In *Pierce v. City and*
6 *County of San Francisco*, No. 4:19-cv-07659-JSW (N.D. Cal.), plaintiffs alleged that male deputies
7 observed female detainees during body cavity searches at SFCJ No. 2 on at least two occasions in
8 2018. The Court in *Pierce* found that the viewing was not sufficiently intentional under the specific
9 evidence before it. The evidence in this case is qualitatively different and categorically stronger.
10 Here: male deputies were deliberately positioned as partitions with sightlines into the search area; a
11 supervisor explicitly refused to deactivate cameras recording women’s naked bodies; a supervisor
12 made statements comparing the footage to publicly distributed television; and a supervisor
13 threatened continued searches against women who complained. This is not a case of casual or
14 accidental viewing. It is a case of deliberate, supervisory-authorized, systematically inflicted
15 violation.

16 71. Under Sheriff Miyamoto’s authority and, on information and belief, pursuant to policies
17 designed and implemented by Undersheriff Johnson, SFSO has maintained, ratified, or failed to
18 correct the following policies and practices: (a) suspicionless mass strip searches of women without
19 individualized justification; (b) deliberate positioning of male deputies to observe women during
20 strip searches; (c) activation or failure to deactivate BWCs during strip searches; (d) denial of
21 menstrual hygiene products following compelled removal of those products; (e) retaliation against
22 detainees who file grievances or organize rights advocacy; (f) strip searches following supervised
23 movement without individualized suspicion; and (g) failure to prevent deputies from engaging in
24 sexualized observation and harassment of women in custody. Each reflects an official policy or
25 longstanding custom with final policymaker ratification, or a failure to train amounting to deliberate
26 indifference.

27 **CLASS ACTION ALLEGATIONS**

28 72. Plaintiffs bring this action on their own behalf and on behalf of all persons similarly situated

1 under Federal Rule of Civil Procedure 23(a) and (b)(3), and for purposes of injunctive and
2 declaratory relief under Rule 23(b)(2). Plaintiffs additionally seek certification of common liability
3 issues under Rule 23(c)(4), as described herein. The proposed class and subclasses are organized
4 around the core constitutional violations established by the May 22, 2025 operation, supplemented
5 by a post-movement search subclass reflecting a continuing and documented practice. The severe
6 post-May 22 violations experienced by named plaintiffs-including penetrating searches, denial of
7 medical privacy during childbirth, and First Amendment retaliation-are pleaded as evidence of
8 SFSO’s pattern and practice for purposes of class-wide liability and Monell liability, and support
9 the relief sought on behalf of the entire class. These violations were not random or individual: they
10 were institutionalized, supervisory-authorized, policy-driven, repeatable, and part of a broader
11 culture and operational structure within SFSO custody operations that is susceptible to generalized
12 proof through centralized institutional evidence.

13 A. Class Definition

14 73. The proposed Class (“the Class”) consists of: All women who were detained in B Pod or any
15 women’s housing unit at San Francisco County Jail Number 2 on May 22, 2025, and who were
16 present in the pod during the mass strip search operation conducted that day. The Class is anchored
17 to May 22, 2025 because that operation is the clearest, most thoroughly documented instance of the
18 challenged policies in action. The Class is ascertainable from Defendants’ housing rosters,
19 movement logs, and incident reports for that date.

20 B. Subclass Definitions and Class Representatives

21 74. Subclass One - The Searched Subclass. This subclass consists of all women in the Class who
22 were directly required to remove their clothing and submit to a strip and visual body cavity search
23 during the May 22, 2025 operation, including being ordered to lift their breasts, spread their
24 buttocks, squat, and cough, in the presence of male deputies who were deliberately positioned to
25 observe the searches and while SFSO deputies’ body-worn cameras were activated and recording.
26 The Searched Subclass unifies what were pleaded as separate cross-gender observation and BWC
27 recording subclasses in the original draft because those injuries are not separable from the search
28 itself: the deliberate male observation and the deliberate recording were integral features of how the

1 search was conducted, not incidental events that can be adjudicated independently. Proposed class
2 representatives: MARILYN SAHAGUN LOPEZ, whose statement that male deputies were used as
3 partitions specifically so they could see into the search area is the factual anchor for the cross-gender
4 observation theory; GIOVANNA RAMIREZ-HERNANDEZ, who was searched by Deputy
5 Dockery, heard Sergeant Ibarra refuse to permit camera deactivation, and personally observed that
6 Dockery's camera was on throughout the search; and DAMENA PAGE, who specifically asked
7 deputies to deactivate their cameras, was refused, and was told the recording was "not going to be
8 used for people to view it"-a direct statement of awareness and deliberate choice.

9 75. Subclass Two - The Present But Not Searched Subclass. This subclass consists of all women
10 in the Class who were present in B Pod on May 22, 2025 and were ordered into the common area
11 and held there under armed supervision while other women were strip searched, but who were not
12 themselves selected for a search that day. These women were compelled to witness, under armed
13 guard, the forced nudity and intimate exposure of other women in their housing unit. They were not
14 told whether or how they would be selected, they reasonably feared imminent selection, and they
15 were subjected to a coercive atmosphere of control, humiliation, and surveillance. Their
16 constitutional injuries-invasion of privacy, substantive due process violation, and Bane Act
17 coercion-are real and cognizable even absent physical touching. Proposed class representative:
18 ALEXCIS HERRERA, who was present in the pod during the May 22 operation, was not searched,
19 witnessed the searches of others, heard Sergeant Ibarra refuse to permit camera deactivation, and
20 the following day challenged Ibarra about the recordings.

21 76. Subclass Three - The Menstrual Hygiene Subclass. This subclass consists of all women in
22 the Class who were menstruating on May 22, 2025 and were required to remove their menstrual
23 hygiene products as part of the strip search and were not promptly provided with replacement
24 products, resulting in denial of basic medical sanitation, compelled management of intimate hygiene
25 needs while naked and under observation, and in some cases bleeding through their clothing while
26 awaiting supplies. This subclass rests on a distinct and gender-specific constitutional harm that is
27 independent of but compounded by the search itself: Defendants' failure to restore basic sanitary
28 conditions after forcing women to remove menstrual products was objectively unreasonable and

1 imposed injury unique to women. Proposed class representatives: LASONYA WELLS, who was
2 forced to remove her tampon and was not provided a replacement; and JAYLA GLASER, who was
3 not provided a replacement pad, was told she would receive clean underwear and was not given any,
4 and subsequently bled through her underwear while waiting for supplies.

5 77. Subclass Four - The Post-Movement Search Subclass. This subclass consists of all women
6 detained at SFCJ No. 2 at any time from January 1, 2023 to the present who were subjected to a
7 strip or visual body cavity search upon return from a court appearance, medical appointment inside
8 or outside the facility, or supervised family visitation, without individualized reasonable suspicion
9 that they were concealing contraband, and without any security event or observed behavior
10 providing an articulable basis for the search, where the woman had been under continuous SFSO
11 supervision and physical restraint throughout her movement. The class period for this subclass is
12 not limited to the period surrounding May 22, 2025: the post-movement strip search practice
13 predates that operation, as reflected in Plaintiff Montoya's account of being subjected to strip
14 searches approximately every two months before May 22 and Plaintiff Gonzales's account of
15 repeated strip searches before the pandemic. This subclass potentially encompasses a substantially
16 larger number of women than the twenty named Plaintiffs, given the frequency with which women
17 detained at SFCJ No. 2 are transported to court, medical appointments, and family visits, and the
18 categorical, non-individualized nature of SFSO's post-movement search practice. Post-movement
19 strip searches imposed as a categorical default rule-regardless of supervision level, regardless of
20 individualized suspicion, and regardless of whether the woman had any unsupervised contact-are
21 constitutionally unreasonable under *Bell v. Wolfish* and its progeny, and their predictable deterrent
22 effect on women's access to medical care and family contact imposes a distinct and ongoing
23 constitutional injury. Proposed class representatives: LISA GONZALES, who was subjected to
24 repeated pre-pandemic strip searches following routine movement and was searched after her May
25 22 tort claim in what she believed was retaliation; SILVIA MONTOYA, who was subjected to a
26 pat-down search by four male deputies in a hallway following a supervised visit with her
27 grandchildren on October 15, 2025; and SARAH WALLS, who was strip searched on return from
28 federal court in August 2025 with a BWC activated and without privacy.

1 C. Additional Evidence of SFSO Pattern and Practice

2 78. The following facts, experienced by named plaintiffs, are pleaded as evidence of SFSO's
3 class-wide pattern and practice of constitutional violations and as support for Monell liability. They
4 demonstrate that the violations described herein were not isolated to May 22, 2025, but reflect a
5 continuing and escalating institutional practice: (a) LISA GONZALES was subjected to a June 17,
6 2025 "orifice search," a penetrating internal examination conducted without warrant or probable
7 cause, establishing that SFSO's suspicionless invasive search practices extended well beyond the
8 May 22 operation; (b) LACARLA CARR was subjected in July 2025 to a search in which a deputy
9 used a flashlight to illuminate the interior of her vagina without warrant, further confirming the
10 institutionalized nature of invasive search practices; (c) TAYLOR ROSS was subjected to
11 compelled observation by male deputies during pelvic examinations by medical professionals and
12 breastfeeding while hospitalized, demonstrating SFSO's policy of cross-gender observation
13 extending beyond the jail facility itself; and (d) LASONYA WELLS, ALEXCIS HERRERA,
14 MARILYN SAHAGUN LOPEZ, VICTORIA CHEW, DAMENA PAGE, ADRIANA GONZALEZ
15 OCHOA, COURTNEY BOSSE, SILVIA MONTOYA, MELISSA PERNA, and GIOVANNA
16 RAMIREZ-HERNANDEZ each suffered adverse actions following their filing of grievances, tort
17 claims, or public advocacy regarding the May 22 operation, establishing a systematic, facility-wide
18 pattern of retaliation against women who exercised their First Amendment rights. These facts are
19 incorporated as class-wide evidence of SFSO's policies and customs. Plaintiffs further reserve the
20 right to move for certification of additional subclasses following discovery if the evidence
21 establishes sufficient numerosity and commonality.

22 D. Rule 23(a) Requirements

23 79. Numerosity: The Class and each Subclass are sufficiently numerous that joinder of all
24 members is impracticable. SFCJ No. 2 is the only women's jail in San Francisco County. The May
25 22, 2025 operation affected the entire female population of B Pod. The Post-Movement Search
26 Subclass encompasses an ongoing practice affecting all women at the facility who were transported
27 to court appearances, medical appointments, or supervised family visits over a multi-year period - a
28 category that encompasses potentially hundreds of women over the class period given the frequency

1 of such movements and the volume of women cycling through the facility. The twenty named
2 Plaintiffs are among an unknown but potentially substantially larger number of women subjected to
3 SFSO's strip search policies and customs before, on, and after May 22, 2025. Strip searches were
4 conducted at SFCJ No. 2 with regularity both before and after May 22, and the post-movement
5 search practice described herein was applied as a categorical default to all women returning from
6 outside movement regardless of their supervision status. Plaintiff Silvia Montoya, for example, was
7 subjected to strip searches approximately every two months before May 22, 2025, and Plaintiff Lisa
8 Gonzales was subjected to repeated strip searches before the pandemic. These allegations reflect an
9 institutional practice of sufficient frequency and breadth that the class likely encompasses far more
10 than the twenty women who have stepped forward as named Plaintiffs at this stage of the litigation.
11 Precise numbers are ascertainable through Defendants' housing rosters, booking records, movement
12 logs, search logs, BWC activation metadata, and incident reports.

13 80. Commonality: Common questions of law and fact predominate for each subclass. For the
14 Searched Subclass: whether the May 22 operation was conducted without individualized suspicion;
15 whether male deputies were deliberately positioned to observe naked women; whether BWC
16 activation during strip searches violated the Fourth Amendment; whether supervisory authorization
17 rendered the conduct a municipal policy. For the Present But Not Searched Subclass: whether
18 compelled observation of others' strip searches under armed guard violated substantive due process
19 and the Bane Act. For the Menstrual Hygiene Subclass: whether failure to provide replacement
20 products after compelled removal constituted an objectively unreasonable condition. For the Post-
21 Movement Search Subclass: whether categorical post-movement strip searches without
22 individualized suspicion are constitutionally unreasonable.

23 81. Typicality: The proposed class representatives' claims are typical of the claims of their
24 respective subclasses. Each representative was subjected to the same core practice, at the same
25 facility, by the same agency, pursuant to the same policies and customs, and suffered the same types
26 of constitutional injury as the subclass members they seek to represent.

27 82. Adequacy: The proposed class representatives will fairly and adequately protect the interests
28 of their respective subclasses. They have no interests antagonistic to those subclasses, and Plaintiffs

1 have retained counsel experienced in federal civil rights litigation and complex class actions.

2 E. Rule 23(b) Requirements

3 83. Rule 23(b)(3): For all subclasses, common questions of law and fact predominate over
4 individual questions, and a class action is superior to other available methods. Class members who
5 are or were incarcerated face substantial barriers to individual suit, including fear of retaliation,
6 limited legal resources, and the difficulty of preserving evidence within a custodial setting. Liability
7 for all subclasses turns on common proof regarding SFSO's policies, practices, and supervisory
8 decisions. Critically, the central liability questions-whether SFSO maintained policies or customs
9 authorizing suspicionless strip searches, whether BWC activation during those searches was
10 supervisory policy, whether cross-gender observation was deliberate institutional practice, and
11 whether the retaliation that followed complaints was coordinated and systemic-are each susceptible
12 to common, generalized proof through centralized institutional evidence, including body-worn
13 camera activation metadata, jail movement logs, housing rosters, shift assignments, search logs,
14 PREA complaints, grievance records, segregation records, policy manuals, training materials,
15 supervisory communications, disciplinary files, surveillance footage, and jail-wide practices. These
16 categories of evidence are by definition common to the class and are not dependent on individualized
17 inquiry. Even if damages ultimately require some individualized proceedings, that prospect does not
18 defeat predominance where, as here, the core liability determination is driven entirely by common
19 institutional proof.

20 84. Rule 23(b)(2): For all subclasses, Defendants have acted or refused to act on grounds
21 generally applicable to the subclass as a whole, making final injunctive and declaratory relief
22 appropriate on a classwide basis. The relief sought-prohibition of suspicionless mass searches,
23 prohibition of cross-gender observation and BWC recording during searches, provision of menstrual
24 hygiene following compelled removal of products, and prohibition of post-movement searches
25 without individualized suspicion-would provide uniform relief applicable to all subclass members.
26 Because Defendants' liability-generating conduct operates through institutional policy and custom,
27 injunctive relief targeting those policies would redress the constitutional injuries of all class
28 members without individualized inquiry. Rule 23(b)(2) certification is particularly appropriate here

1 because the primary relief sought is systemic: reform of SFSO’s institutional policies governing
2 strip searches, body-worn camera use during intimate searches, cross-gender observation, menstrual
3 hygiene provision, and retaliation. These policies affect all women in SFSO custody in the same
4 way, and declaratory and injunctive relief directed at those policies would benefit the class as a
5 whole.

6 F. Rule 23(c)(4) Issues Class Certification

7 85. In the alternative, and in addition to certification of the Class and Subclasses under Rule
8 23(b)(2) and Rule 23(b)(3), Plaintiffs expressly seek certification of the following common liability
9 issues pursuant to Federal Rule of Civil Procedure 23(c)(4). Certification of a common issues class
10 is appropriate when resolution of particular issues—even if damages later require individualized
11 proceedings—would materially advance the litigation as a whole. Where, as here, the resolution of
12 common institutional policy questions would generate common answers apt to drive the resolution
13 of the case, an issues class under Rule 23(c)(4) provides an efficient and constitutionally sound
14 mechanism for adjudicating systemic institutional liability. The following questions are common to
15 all class members and are susceptible to generalized proof through the centralized institutional
16 evidence described herein, and their resolution in a single proceeding would significantly advance
17 the just and efficient adjudication of this action: (a) whether SFSO maintained a policy or custom
18 authorizing or permitting suspicionless mass strip searches of women detained at SFCJ No. 2
19 without individualized reasonable suspicion; (b) whether SFSO maintained a policy or custom
20 permitting or directing the activation of body-worn cameras during strip or visual body cavity
21 searches of women; (c) whether SFSO maintained a policy or custom permitting male deputies to
22 be deliberately positioned within visual range of women undergoing strip or visual body cavity
23 searches; (d) whether SFSO maintained a policy or custom authorizing post-movement strip
24 searches of women following court appearances, medical appointments, or supervised family
25 visitation absent individualized suspicion and absent any unsupervised contact during movement;
26 and (e) whether SFSO maintained a policy or custom of retaliating against women detained at SFCJ
27 No. 2 who filed grievances, organized other detainees to file claims, or engaged in public advocacy
28 regarding the conditions of their confinement. Each of these questions is susceptible to common,

1 class-wide proof through documentary evidence in SFSO’s possession, including policy manuals,
2 training materials, body-worn camera activation logs and metadata, jail movement logs, grievance
3 records, segregation records, supervisory communications, and shift assignments. Certification of
4 these common liability issues is appropriate even if damages ultimately require individualized
5 proceedings as to each class member, because resolution of the common institutional questions will
6 generate determinations that apply uniformly to every member of the Class and each Subclass and
7 will materially advance the efficient adjudication of this action.

8 G. Bifurcation, Phased Certification, and Class Management

9 86. Plaintiffs expressly reserve the right to seek, following discovery and expert analysis, any of
10 the following class management mechanisms as circumstances warrant: (a) phased certification,
11 including a first phase limited to common liability questions and a second phase addressing
12 individualized damages; (b) bifurcated proceedings with liability tried before the Class and damages
13 determined in subsequent individualized or subclass proceedings; (c) liability-only class
14 certification, with damages reserved for subsequent proceedings before the Court or a special
15 master; (d) separate damages proceedings employing representative sampling or other aggregate
16 proof methodologies approved by the Court; (e) refinement, division, addition, narrowing, or
17 reconfiguration of subclasses based on evidence developed in discovery and the opinions of liability
18 and damages experts; and (f) appointment of a special master or claims administrator to manage the
19 damages phase if the Court determines that individualized proceedings are necessary following
20 resolution of common liability issues. Plaintiffs submit that this action is well-suited to phased or
21 bifurcated treatment because the institutional policy and custom questions that drive liability are
22 entirely common to the class, while any individualized damages inquiry, if required, is secondary
23 to and entirely dependent upon the threshold determination of whether SFSO’s institutional policies
24 were constitutionally deficient. Plaintiffs respectfully request that the Court evaluate the
25 certification structure with these class management tools in view, and invite the Court to exercise
26 its broad discretion under Rule 23(d) and (c)(1)(E) to issue any orders necessary to effectuate the
27 fair and efficient resolution of this action.

28 **CLAIMS FOR RELIEF**

1 **FIRST CAUSE OF ACTION 42 U.S.C. Section 1983 - Fourth Amendment**

2 **Unreasonable Strip Search And Visual Body Cavity Search**

3 **(Against All Defendants, Including Undersheriff Johnson in Her Individual and Official**
4 **Capacities)**

5 87. Plaintiffs re-allege and incorporate by reference all preceding allegations.

6 88. The Fourth Amendment, made applicable to the states through the Fourteenth Amendment,
7 protects all persons, including pretrial detainees, from unreasonable searches. *Bell v. Wolfish*, 441
8 U.S. 520 (1979); *Florence v. Board of Chosen Freeholders*, 566 U.S. 318 (2012). A strip search or
9 visual body cavity search is unreasonable under the Fourth Amendment when it is suspicionless,
10 conducted without a legitimate penological justification, or conducted in a manner that is
11 unnecessarily degrading or humiliating. The Ninth Circuit has recognized that cross-gender strip
12 searches in which male officials intentionally observe female detainees' naked bodies are
13 constitutionally unreasonable. See *Byrd v. Maricopa County Sheriff's Department*, 629 F.3d 1135
14 (9th Cir. 2011).

15 89. The searches described herein were suspicionless, mass, random, and unjustified by any
16 individualized determination of security need. The May 22, 2025 operation searched an entire
17 housing pod without any basis for suspecting any individual woman of concealing contraband. The
18 post-movement searches were conducted regardless of the degree of continuous supervision
19 maintained during movement. The invasive penetrating examinations described by plaintiffs
20 Gonzales and Carr required, at minimum, individualized probable cause and, in most circumstances,
21 a warrant.

22 90. The cross-gender nature of the searches rendered them additionally unreasonable. In contrast
23 to cases where courts have found male viewing of female searches to be incidental or casual, the
24 evidence here establishes intentional deliberateness: male deputies were used as partitions
25 specifically positioned to observe naked women; a supervisor explicitly refused to permit camera
26 deactivation; and a supervisor acknowledged on multiple occasions that women's naked bodies were
27 being recorded. The viewing in this case was not incidental. It was structural. Defendants cannot
28 claim the defense available in cases of casual or accidental observation.

1 91. The activation of body-worn cameras during strip searches, over the express objection of
2 detainees and pursuant to the explicit instruction of a supervisory sergeant, constituted an additional
3 Fourth Amendment violation. The permanent digital capture of women’s naked bodies during
4 intimate searches serves no legitimate security interest and constitutes an unreasonable seizure of
5 intimate images.

6 92. All Defendants acted under color of state law. Their conduct deprived Plaintiffs and class
7 members of rights secured by the Fourth and Fourteenth Amendments. Plaintiffs are entitled to
8 compensatory and punitive damages, declaratory relief, and injunctive relief.

9 **SECOND CAUSE OF ACTION 42 U.S.C. Section 1983 - Fourteenth Amendment**

10 **Substantive Due Process / Bodily Integrity**

11 **(Against All Defendants, Including Undersheriff Johnson in Her Individual and Official**
12 **Capacities)**

13 93. Plaintiffs re-allege and incorporate by reference all preceding allegations.

14 94. The Fourteenth Amendment prohibits government conduct that shocks the conscience and
15 violates the bodily integrity of persons in state custody. *Rochin v. California*, 342 U.S. 165 (1952).
16 Pretrial detainees are protected from punishment and from government conduct that would not be
17 rationally related to a legitimate governmental objective. *Kingsley v. Hendrickson*, 576 U.S. 389
18 (2015).

19 95. Defendants’ conduct - including mass suspicionless strip searches, intentional cross-gender
20 observation, unauthorized digital recording of naked women, denial of menstrual hygiene,
21 penetrating examinations without a warrant, and deliberate use of searches as weapons of
22 punishment and retaliation - shocks the conscience and violates Plaintiffs’ substantive due process
23 right to bodily integrity.

24 96. Sergeant Ibarra’s explicit refusal to permit deactivation of BWCs during intimate searches,
25 his statements comparing footage to entertainment television while women were standing naked
26 under guard, his threats conditioning future searches on women’s silence, and the systematic
27 retaliation against women who sought redress collectively establish that Defendants acted
28 intentionally and with conscious disregard of the unconstitutionality of their conduct.

1 **THIRD CAUSE OF ACTION 42 U.S.C. Section 1983 - Fourteenth Amendment**

2 **Equal Protection Clause - Sex Discrimination**

3 **(Against All Defendants, Including Undersheriff Johnson in Her Individual and Official**
4 **Capacities)**

5 97. Plaintiffs re-allege and incorporate by reference all preceding allegations.

6 98. The Equal Protection Clause prohibits intentional discrimination on the basis of sex. Strip
7 searches deliberately arranged to expose women’s bodies to male official observation, and the denial
8 of basic menstrual hygiene following compelled removal of menstrual products, constitute
9 intentional sex-based discrimination. The deliberate positioning of male deputies as observational
10 partitions during women’s intimate searches is gender-based humiliation with no counterpart in the
11 treatment of male detainees. These practices were imposed on women because they are women and
12 would not have been imposed on male detainees in any remotely analogous form.

13 **FOURTH CAUSE OF ACTION 42 U.S.C. Section 1983 - Eighth Amendment**

14 **Cruel and Unusual Punishment (Alternative)**

15 **(Against All Defendants; Applicable to Convicted Plaintiffs)**

16 99. Plaintiffs re-allege and incorporate by reference all preceding allegations.

17 100. To the extent any Plaintiff was a convicted prisoner at the time of the searches, the Eighth
18 Amendment’s prohibition on cruel and unusual punishment applies. The Eighth Amendment
19 prohibits the wanton and unnecessary infliction of pain or suffering. *Farmer v. Brennan*, 511 U.S.
20 825 (1994). The conduct described herein - including mass suspicionless searches conducted to
21 humiliate, intentional cross-gender observation, unauthorized recording, denial of menstrual
22 hygiene, and penetrating examinations without cause - violates the Eighth Amendment as applied
23 to any Plaintiff held in convicted status.

24 **FIFTH CAUSE OF ACTION 42 U.S.C. Section 1983 - First Amendment**

25 **Retaliation for Protected Activity**

26 **(Against All Defendants, Including Undersheriff Johnson in Her Individual and Official**
27 **Capacities)**

28 101. Plaintiffs re-allege and incorporate by reference all preceding allegations.

1 102. The First Amendment protects the right of incarcerated persons to file grievances, access
2 courts, and petition for redress. *Rhodes v. Robinson*, 408 F.3d 559 (9th Cir. 2005). A government
3 official violates the First Amendment when adverse action is taken against an inmate because of the
4 inmate’s exercise of a protected right, and the adverse action would chill or deter a person of
5 ordinary firmness.

6 103. The retaliation described herein was systematic, coordinated, and directed at an identifiable
7 class of women who exercised their First Amendment rights. Defendants’ retaliatory conduct was
8 uniform in nature-targeting women who filed grievances, organized tort claims, or engaged in public
9 advocacy regarding the May 22 operation-and reflects a facility-wide policy and practice of
10 suppressing protected speech through adverse action. The named plaintiffs’ experiences are
11 representative of the class-wide pattern of retaliation and are asserted both as direct class claims and
12 as evidence of SFSO’s municipal custom and policy for purposes of Monell liability. Plaintiffs
13 further reserve the right to move for certification of a dedicated retaliation subclass following
14 discovery.

15 104. Defendants engaged in the following retaliatory acts: (a) placing plaintiff LaSonya Wells
16 in segregation within one week of her organization of tort claim filings; (b) placing plaintiff Alexcis
17 Herrera in segregation within one week of the same activity; (c) removing plaintiff Marilyn Sahagun
18 Lopez from her work assignment after she complained; (d) placing plaintiff Victoria Chew in
19 segregation after she filed a grievance; (e) placing plaintiff Damena Page in segregation after she
20 filed a tort claim; (f) removing plaintiffs Ochoa, Montoya, Sahagun Lopez, and Ramirez-Hernandez
21 from kitchen work assignments following the public press conference; and (g) subjecting plaintiffs
22 Ochoa and Perna to approximately four additional targeted strip searches after they filed a
23 grievance.

24 105. Sergeant Ibarra’s direct threat in November 2025 - that strip searches would continue unless
25 women stopped “disrespecting deputies” - conditioned the cessation of unconstitutional practices
26 on the silencing of protected speech. This constitutes both retaliation and coercive chilling of First
27 Amendment-protected activity.

28 **SIXTH CAUSE OF ACTION 42 U.S.C. Section 1983 - Monell and Supervisory Liability**

1 (Against CCSF, SFSO, Sheriff Miyamoto, and Sergeant Ibarra)

2 106. Plaintiffs re-allege and incorporate by reference all preceding allegations.

3 107. Under *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658 (1978), a municipality is liable under
4 section 1983 when a constitutional violation results from an official policy, an unofficial custom or
5 practice, a final policymaker's ratification, or a failure to train or supervise amounting to deliberate
6 indifference.

7 108. Official Policy: SFSO maintained official policies governing strip search procedures, body-
8 worn camera use, and detainee movement at SFCJ No. 2. Those policies, as applied by Sergeant
9 Ibarra and other personnel, authorized or failed to prevent the suspicionless mass searches, cross-
10 gender observation, and BWC recording described herein. Sheriff Miyamoto, as the elected final
11 policymaker, and Undersheriff Johnson, as the operational policymaker for custody, are each
12 responsible for those policies. Plaintiffs are informed and believe and thereon allege that
13 Undersheriff Johnson was the originating architect of the strip search practices challenged herein,
14 and that those practices were implemented pursuant to her direction and authority.

15 109. Longstanding Custom and Practice: SFSO has maintained a longstanding practice of
16 subjecting women at SFCJ No. 2 to suspicionless strip searches and cross-gender observation.
17 *Pierce v. CCSF*, No. 4:19-cv-07659-JSW (N.D. Cal. 2021) documented nearly identical cross-
18 gender body cavity searches at SFCJ No. 2 in 2018. The continuation and escalation of those
19 practices in 2025 - now with the addition of deliberate BWC recording - demonstrates an entrenched
20 institutional custom, not an isolated deviation.

21 110. Final Policymaker Ratification: Sheriff Miyamoto ratified the constitutional violations
22 described herein by maintaining the policies and practices that caused them, failing to discipline or
23 retrain personnel, and continuing to permit mass suspicionless searches, cross-gender observation,
24 BWC recording during searches, and retaliation against complainants. Undersheriff Johnson
25 independently ratified the constitutional violations as the operational policymaker for custody:
26 Plaintiffs are informed and believe and thereon allege that Johnson designed or approved the strip
27 search practices at issue, that she was aware of the manner in which those practices were
28 implemented at SFCJ No. 2, and that she took no corrective action. Johnson's ratification as a

1 functional final policymaker for custody operations is an independent basis for municipal liability
2 under Monell.

3 111. Deliberate Indifference to Training and Supervision: SFSO's persistent failure to train
4 deputies on the constitutional requirements governing strip searches - including the prohibition on
5 cross-gender observation, the prohibition on recording during intimate searches, the requirement of
6 individualized suspicion, and the prohibition on retaliation - constitutes deliberate indifference. The
7 prior litigation in *Pierce*, the ongoing formal complaints by detainees, and the predictability that
8 mass searches of women would be conducted in the presence of male deputies and with cameras
9 activated establish that SFSO was on notice of the risk of constitutional violations and chose to do
10 nothing.

11 112. Supervisory Liability - Sergeant Ibarra: Sergeant Ibarra personally directed the conduct
12 causing Plaintiffs' injuries, explicitly instructed Deputy Dockery not to deactivate her BWC, made
13 threatening statements about future searches, and ordered or ratified retaliatory segregation of
14 complainants. He is individually liable as a supervisor under section 1983.

15 113. Supervisory Liability - Undersheriff Johnson: Undersheriff Johnson is individually liable
16 as a supervisory defendant under section 1983. A supervisor is liable when she sets in motion a
17 series of acts by others that she knew or reasonably should have known would cause others to inflict
18 constitutional injury, or when she knew of the violations and failed to act to prevent them. *Starr v.*
19 *Baca*, 652 F.3d 1202 (9th Cir. 2011). Plaintiffs are informed and believe and thereon allege that
20 Johnson, as the operational architect of the custody strip search policies, set in motion the acts that
21 caused Plaintiffs' injuries. She knew or reasonably should have known that mass suspicionless
22 searches of women conducted with male deputies in observation positions and with body-worn
23 cameras activated would violate the constitutional rights of women detainees. Her failure to prohibit
24 cross-gender observation, prohibit BWC recording during searches, require individualized
25 suspicion, and implement basic post-search menstrual hygiene protocols reflects a deliberate choice
26 to maintain policies she knew to be constitutionally deficient. Johnson is sued in her individual
27 capacity for supervisory liability and in her official capacity for purposes of Monell and declaratory
28 and injunctive relief.

1 **SEVENTH CAUSE OF ACTION California Constitution, Article I, Section 1**

2 **Right to Privacy**

3 **(Against All Defendants, Including Undersheriff Johnson in Her Individual and Official**
4 **Capacities)**

5 114. Plaintiffs re-allege and incorporate by reference all preceding allegations.

6 115. Article I, Section 1 of the California Constitution guarantees every person an inalienable
7 right of privacy. This right applies to persons in custodial settings and encompasses the right to
8 bodily privacy and freedom from government observation of one’s naked body without justification.

9 116. Defendants’ mass suspicionless strip searches, deliberate cross-gender observation, and
10 activation of body-worn cameras to capture images of naked women during intimate searches violate
11 the California constitutional right to privacy. Plaintiffs are entitled to damages and injunctive relief.

12 **EIGHTH CAUSE OF ACTION California Constitution, Article I, Section 13**

13 **Unreasonable Search and Seizure**

14 **(Against All Defendants, Including Undersheriff Johnson in Her Individual and Official**
15 **Capacities)**

16 117. Plaintiffs re-allege and incorporate by reference all preceding allegations.

17 118. Article I, Section 13 of the California Constitution independently prohibits unreasonable
18 searches and seizures, providing protections at least co-extensive with the Fourth Amendment. For
19 the reasons stated in the First Cause of Action and throughout this Complaint, Defendants’ strip
20 search practices, cross-gender observation, and BWC recording during intimate searches violated
21 the California Constitution. Plaintiffs are entitled to damages and injunctive relief.

22 **NINTH CAUSE OF ACTION California Civil Code Section 52.1 (The Bane Act)**

23 **Interference with Constitutional Rights by Threat, Intimidation, or Coercion**

24 **(Against All Defendants, Including Undersheriff Johnson in Her Individual and Official**
25 **Capacities)**

26 119. Plaintiffs re-allege and incorporate by reference all preceding allegations.

27 120. The Bane Act, California Civil Code section 52.1, prohibits interference by threats,
28 intimidation, or coercion with the exercise or enjoyment by any individual of rights secured by the

1 Constitution or laws of the United States or California. It provides for compensatory and punitive
2 damages, injunctive relief, and attorneys' fees.

3 121. Defendants interfered with Plaintiffs' constitutional rights through specific acts of threat,
4 intimidation, and coercion, including: (1) compelling women to strip naked under armed guard while
5 male deputies deliberately watched; (2) activating BWCs during searches and threatening women
6 with permanent digital capture of their naked bodies; (3) making statements that footage would be
7 publicly distributed unless genitalia were "blurred"; (4) retaliating against women who filed
8 grievances by placing them in segregation, removing work assignments, and subjecting them to
9 targeted searches; (5) threatening continued strip searches unless women ceased complaints; and (6)
10 entering a laboring woman's hospital room and refusing to leave during pelvic examinations and
11 breastfeeding.

12 122. The Bane Act's specific intent requirement is satisfied. Sergeant Ibarra's explicit refusal to
13 permit BWC deactivation, his retaliatory threats, and the systematic placement of male deputies as
14 observational partitions all establish that Defendants intended to violate Plaintiffs' constitutional
15 rights. *Venegas v. County of Los Angeles*, 32 Cal.4th 820 (2004).

16 **TENTH CAUSE OF ACTION California Civil Code Section 52.4 (Gender Violence)**
17 **(Against Individual Defendants and Does)**

18 123. Plaintiffs re-allege and incorporate by reference all preceding allegations.

19 124. California Civil Code section 52.4 provides a civil cause of action for "gender violence,"
20 defined to include a physical intrusion or invasion of a sexual nature under coercive conditions. It
21 authorizes compensatory and punitive damages, injunctive relief, and attorneys' fees.

22 125. Defendants' conduct constitutes gender violence. The compelled exposure of women's
23 genitalia and intimate body parts to male deputies, the penetrating searches described by plaintiffs
24 Gonzales and Carr, the groping of plaintiff Lopez's breast by Deputy Mustos, and the systematic
25 sexual humiliation of women during the May 22, 2025 operation constitute physical intrusions or
26 invasions of a sexual nature under coercive conditions. The gender-specific nature of the harm -
27 imposed on women specifically because of their gender, through compelled nudity and genital
28 exposure before male authority figures - establishes the gender nexus required by section 52.4.

1 **ELEVENTH CAUSE OF ACTION Battery**

2 **(Against Deputy Mustos, Deputy Dockery, Deputy Ng, and Does)**

3 126. Plaintiffs re-allege and incorporate by reference all preceding allegations.

4 127. Battery is the harmful or offensive touching of another person without consent. The
5 warrantless, suspicionless intimate body searches described herein - including the groping of
6 plaintiff Lopez's breast by Deputy Mustos and the penetrating examinations described by plaintiffs
7 Gonzales and Carr - constituted harmful and offensive touching without lawful justification or
8 meaningful consent. The touching was carried out under color of official authority and coercive
9 conditions that precluded any genuine voluntary consent. Plaintiffs are entitled to compensatory and
10 punitive damages.

11 **TWELFTH CAUSE OF ACTION Intentional Infliction of Emotional Distress**

12 **(Against All Defendants, Including Undersheriff Johnson in Her Individual and Official**
13 **Capacities)**

14 128. Plaintiffs re-allege and incorporate by reference all preceding allegations.

15 129. Intentional infliction of emotional distress requires extreme and outrageous conduct,
16 intentional or reckless disregard of the probability of causing severe emotional distress, and actual
17 severe emotional distress. *Hughes v. Pair*, 46 Cal.4th 1035 (2009).

18 130. Defendants' conduct was extreme and outrageous beyond all reasonable bounds of
19 decency. Compelling women to strip naked under armed guard while male deputies watched;
20 recording those women with BWCs without consent; threatening to publicly distribute footage of
21 their naked bodies; denying menstrual hygiene to menstruating women after forcing removal of
22 sanitary products; subjecting women to digital penetration during searches; groping a detainee's
23 breast after her strip search; retaliating against women who sought redress; and entering a woman's
24 hospital room during childbirth and breastfeeding while refusing to leave - these acts collectively
25 shock the conscience and exceed any recognized standard of lawful government conduct.

26 131. Plaintiff Jazmin Mendez continues to experience nightmares related to the searches and is
27 currently on medication for trauma-related symptoms. Plaintiff Taylor Ross was subjected to
28 compelled observation during pelvic exams by medical professionals and while breastfeeding. All

1 named Plaintiffs suffered and continue to suffer severe emotional distress. Plaintiffs are entitled to
2 compensatory and punitive damages.

3 **DAMAGES**

4 132. As a direct and proximate result of each Defendant's acts and omissions, Plaintiffs and all
5 other similarly situated persons have sustained and continue to sustain the following injuries and
6 damages, past and future:

- 7 a. Compensatory damages for all constitutional and statutory violations;
- 8 b. Emotional distress, trauma, nightmares, anxiety, fear, humiliation, indignity, and
9 invasion of bodily integrity and privacy;
- 10 c. Physical injuries, including urinary tract infection, unsanitary conditions from denial of
11 menstrual hygiene, and bodily harm from unlawful penetrating searches;
- 12 d. Loss of work assignments and associated privileges as a result of retaliation;
- 13 e. Harm from unlawful placement in administrative segregation in retaliation for protected
14 activity;
- 15 f. Loss of enjoyment of life and other continued pain and suffering;
- 16 g. All damages and penalties recoverable under 42 U.S.C. sections 1983 and 1988,
17 California Civil Code sections 52, 52.1, and 52.4, California Code of Civil Procedure
18 section 1021.5, and as otherwise allowed by California and federal law.

19 **PUNITIVE DAMAGES**

20 133. The individual defendants - Sergeant Ibarra, Deputy Dockery, Deputy Ng, Deputy Mustos,
21 and the Doe defendants - acted with oppression, fraud, malice, or reckless disregard of Plaintiffs'
22 constitutional and civil rights. Sergeant Ibarra's explicit refusal to permit deactivation of BWCs
23 during strip searches, his retaliatory threats, his systematic use of segregation to silence
24 complainants, and his direct statement conditioning future searches on women's silence reflect
25 conscious disregard for the rights and dignity of incarcerated women that justifies punitive damages
26 under federal and California law. Deputy Mustos's groping of plaintiff Lopez's breast while making
27 degrading sexual comments constitutes malice and oppression. Plaintiffs are entitled to punitive
28 damages against all individual defendants.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs and the proposed Class and Subclasses respectfully request:

- a. Certification of the proposed Class and Subclasses under Federal Rule of Civil Procedure 23, specifically: (i) the Searched Subclass with class representatives Marilyn Sahagun Lopez, Giovanna Ramirez-Hernandez, and Damena Page; (ii) the Present But Not Searched Subclass with class representative Alexcis Herrera; (iii) the Menstrual Hygiene Subclass with class representatives LaSonya Wells and Jayla Glaser; and (iv) the Post-Movement Search Subclass with class representatives Lisa Gonzales, Silvia Montoya, and Sarah Walls;
- b. Compensatory damages in an amount according to proof, to be determined at trial;
- c. Punitive damages against individual defendants in an amount sufficient to punish and deter;
- d. Declaratory relief establishing that Defendants’ policies and practices - including those designed, directed, and ratified by Undersheriff Katherine Johnson in her role as operational policymaker for SFSO custody - of suspicionless mass strip searches of women, deliberate cross-gender observation during searches, activation of BWCs during intimate searches, denial of menstrual hygiene following compelled removal of products, retaliation against women who file grievances, and categorical post-movement strip searches without individualized suspicion, are unlawful under the United States and California Constitutions and applicable statutes;
- e. Preliminary and permanent injunctive relief: (i) prohibiting suspicionless mass strip searches absent a facility-wide emergency with documented individualized justification; (ii) prohibiting the activation or use of body-worn cameras during any strip or visual body cavity search; (iii) prohibiting the presence of male deputies within visual range of women during strip searches or visual body cavity searches; (iv) requiring prompt provision of replacement menstrual hygiene products following compelled removal of such products; (v) prohibiting pat-down or strip searches of women by male deputies absent a documented emergency authorization; (vi) prohibiting retaliation against

- 1 detainees who file grievances or organize rights advocacy; and (vii) requiring periodic
- 2 monitoring, compliance reporting, and Court oversight;
- 3 f. Attorneys’ fees and costs under 42 U.S.C. section 1988, California Civil Code sections
- 4 52(b)(3) and 52.1(h), California Code of Civil Procedure section 1021.5, and other
- 5 applicable law;
- 6 g. Pre-judgment and post-judgment interest as provided by law;
- 7 h. Such other and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

8
9 Plaintiffs hereby demand a trial by jury on all issues so triable, pursuant to Rule 38(b) of the
10 Federal Rules of Civil Procedure.

11 Respectfully submitted,

12
13 Dated: May 22, 2026

By:

14 /s/
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