

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA

ANA DOE,

Plaintiff,

v.

Case No. 3:25-cv-00804

SCOTTY RHODEN, in his official
capacity as Sheriff of Baker County,
Florida; DUSTIN WILLIAMS, in his
individual capacity; LIEUTENANT
SHARON YOUMANS, in her
individual capacity; and OFFICERS
JOHN AND JANE SMITH 1-X, in their
individual capacities,

Defendants.

COMPLAINT

Plaintiff Ana Doe¹ brings this action under 42 U.S.C. § 1983 and pleads as follows:

I. INTRODUCTION

1. Ms. Doe, a survivor of human trafficking, was detained in U.S. Immigration and Customs Enforcement (“ICE”) custody at the Baker County Detention Center (“Baker”) in Macclenny, Florida, from May through July 2023. During this time, Baker officers and staff subjected her to unconstitutional abuses,

¹ Through the forthcoming Motion for Leave to Proceed Anonymously, Plaintiff Ana Doe respectfully requests leave to proceed with this action under this pseudonym.

including restraining her in a chair with her breast exposed while officers laughed at her. This action seeks general and special damages, declaratory judgment, and injunctive relief to remedy the unconstitutional acts of Baker personnel who engaged in objectively unreasonable conduct that violated Ms. Doe’s clearly established rights under the Fourth and Fourteenth Amendments.

A. Baker’s Abusive History.

2. The Baker County Sheriff’s Office has operated in part as a U.S. Immigration and Customs Enforcement (“ICE”) detention center since 2009.²

3. During that time, detained people have repeatedly and publicly reported that Baker personnel violated their constitutional and civil rights, including by engaging in sexual assault, neglecting to provide necessary medical care, harassing detained people on the basis of race, overusing solitary confinement in a punitive manner, and refusing to provide language and translation services to non-English speakers.³

4. The Department of Homeland Security’s Office of Civil Rights and Civil Liberties (“CRCL”) recognized the “abnormally large number” of allegations of severe civil rights abuses at Baker—which members of Congress recently

² Baker also operates in part as a county jail.

³ See, e.g., Letter from Amy Godshall, ACLU of Florida, to Shoba Sivaprasad Wadhia, Officer for CRCL, et al. (Nov. 14, 2024), <https://www.aclufl.org/en/civil-rights-complaint-department-homeland-securitys-office-civil-rights-and-civil-liberties>.

confirmed—and thus conducted a full-scale onsite investigation of Baker in November 2021.⁴ CRCL discovered “serious problems in the areas of unnecessary and excessive uses of force, uses of segregation, language access, and verbal abuse by staff.”

5. After that investigation, CRCL continued to receive serious complaints regarding ongoing abuses at Baker. According to CRCL, these subsequent complaints “showed consistent patterns of earlier-identified concerns” in addition to “rais[ing] new and highly concerning allegations” regarding medical neglect and inadequate medical care, in addition to staff retaliation for filing grievances and speaking with outside legal and human-rights organizations. By late 2022, CRCL determined that an action plan was needed to “address immediate concerns regarding the health and well-being of persons detained at Baker.”⁵

6. In November 2024, a former nurse practitioner at Baker came forward as a whistleblower, again affirming the pattern of ongoing abuse Baker officers

⁴ Letter from Office for Civil Rights and Civil Liberties, U.S. Department of Homeland Security, to Katie Blankenship, ACLU of Florida (Feb. 6, 2023), https://www.aclufl.org/sites/default/files/field_documents/prea_crcl_response.pdf; Press Release, ACLU of Florida, Federal Government Confirms Wide Range of Abuses at Baker County Detention Center, <https://www.aclufl.org/en/press-releases/federal-government-confirms-wide-range-abuses-baker-county-detention-center>.

⁵ FOIA Response including Memorandum from CRCL to ACLU of Florida (Sept. 19, 2022), and Proposed Immediate Action Plan for Baker County Detention Center (Oct. 6, 2022), <https://www.aclufl.org/en/crclfoiaresponsereceived2-13-24>.

inflicted on detained people for years. This whistleblower also disclosed that Baker staff forge medical documents to deny individuals the care they need.⁶

7. Even former guards have described the deplorable conditions and practices at Baker.⁷ In an exposé in the *Florida Trident*, two Baker guards painted a bleak picture of the facility, with one guard admitting that conditions and treatment at Baker are so awful that detained people are frequently forced to resort to hunger strikes as a “last resort.” That guard also described the popular practice by Baker staff of using collective punishment to end such hunger strikes, including Baker’s practice of shutting off all running water in the facility as retaliation.

8. Baker personnel also have repeatedly been the subject of complaints that they sexually abused women detained at Baker and subjected them to voyeurism.⁸

9. Women detained at Baker have reported that Baker officers forced them to shower, change, or use the bathroom while officers watched.

⁶ Letter from Government Accountability Project to Hon. Richard J. Durbin, et al. (hereinafter “Whistleblower Disclosure”) (Nov. 14, 2024), <https://whistleblower.org/wp-content/uploads/2024/11/Nov-2024-Whistleblower-Disclosure-of-Nurse-Practitioner-Vera-Goodwin-re-Baker.pdf>.

⁷ Jack Randall, Former Guards Paint Bleak Picture of Conditions Inside Notorious Immigration Detention Center in Baker County, *Florida Trident* (Aug. 19, 2024), <https://floridatrident.org/former-guards-paint-bleak-picture-of-conditions-inside-notorious-immigrant-detention-center-in-baker-county>.

⁸ See *id.* at 6 (compiling complaints of sexual abuse and voyeurism at Baker).

10. For example, one woman recounted that a Baker officer demanded that she keep her cell door open as she used the bathroom. He stood in her doorway and stared at her as she removed her clothing, then watched her while she urinated.⁹

11. Another woman described how Baker personnel watched her from the staff tower when she was sitting on the toilet undressed, and that she woke up to officers taking photos of her in her underwear.¹⁰

12. Additional detained women reported that Baker personnel denied them adequate menstrual products.¹¹

13. Baker officers forced one woman who suffered from a pre-existing medical condition to strip off her clothes to prove to those officers that she was, in fact, bleeding. Even after imposing this dehumanizing experience, Baker officers still refused to give her any medication or additional feminine hygiene products. Instead, Baker officers advised her to use her socks as menstrual pads.¹²

⁹ Letter from Katie Blankenship, ACLU of Florida, to Hon. Joseph V. Cuffari, DHS Inspector General, et al. (Sept. 13, 2022), https://www.aclufl.org/sites/default/files/crcl_complaint_-_baker_county_detention_center_-_final.pdf, at 8.

¹⁰ Letter from Bobbeth Morgan to Baker County Detention Center (Sept. 3, 2022), <https://www.aclufl.org/en/voices-baker-bobbeth>.

¹¹ *Id.*; see also Blankenship Letter, at 16-17.

¹² See Blankenship Letter, at 16-17.

14. Baker personnel similarly forced another woman to sleep in blood-soaked sheets because Baker imposed an arbitrary cap on menstrual products; she, too, was instructed to use her socks.¹³

15. Another woman detained at Baker filed a sexual assault and trafficking lawsuit against a Baker officer.¹⁴ A Baker County jury convicted the officer of sexual battery, and a state court sentenced him to 25 years in prison and designated him a sexual predator.¹⁵

B. Baker Staff Abuse Ms. Doe.

16. Ms. Doe, a survivor of both domestic violence and human trafficking, was forced into this toxic environment in May 2023. Ms. Doe suffers from diagnosed post-traumatic stress disorder (“PTSD”), clinical depression, and clinical anxiety.

17. She was arrested in August 2022 after she took her five-year-old son to get ice cream, allegedly in violation of a temporary court order limiting her custody to supervised visitation. After her release, ICE detained Ms. Doe in immigration custody at Baker from May through July 2023.

¹³ *Id.* at 17.

¹⁴ *Doe v. Baker County et al.*, No. 3:23-cv-00609 (M.D. Fla. May 19, 2023).

¹⁵ Allison Matthews, Former Baker County Detention Deputy Sentenced to 25 Years Sexually Battering Inmate, *Action News Jax* (May 5, 2024), <https://www.actionnewsjax.com/news/local/baker-county/former-baker-countydetention-deputy-sentenced-25-years-sexually-battering-inmate/PZPOCG2BWVDC3GDJQX3F2RDVX4/> (last visited Feb. 12, 2025).

18. Consistent with their pattern and practice described above, Baker personnel repeatedly and illegally abused, mistreated, and neglected Ms. Doe during her months in custody at Baker.

19. Ms. Doe is a native Spanish speaker with little proficiency in English. Despite her readily apparent inability to understand English, Baker personnel inaccurately recorded English as her best-spoken language in Baker's records and conducted her intake interview entirely in English without translation.

20. The staff at Baker thereby prevented Ms. Doe from sharing her diagnoses of PTSD, depression, and anxiety. Baker personnel then further misclassified Ms. Doe as having no "immediate health needs or problems."

21. Baker personnel also failed to request Ms. Doe's medical records from her mental health providers, who had documented her diagnoses.

22. Despite Ms. Doe's attempts to request medication, Baker personnel denied Ms. Doe medication that she needed to manage her serious mental health conditions. On the rare occasions where Baker personnel permitted Ms. Doe to see a medical provider, Baker's Psychiatric Nurse Practitioner, Dustin Williams, PMHNP-BC, was condescending and dismissive of Ms. Doe's conditions. Indeed, Defendant Williams refused to take Ms. Doe's condition seriously.

23. Furthermore, despite her diagnosed mental health conditions and her history as a survivor of human trafficking, Baker personnel placed Ms. Doe in a

claustrophobic solitary confinement cell, in contravention to the 2019 National Detention Standards that Baker is contractually required to abide by.¹⁶ Baker personnel's callous and improper use of solitary confinement caused Ms. Doe's physical and mental health to rapidly and significantly deteriorate.

24. When Baker personnel's mistreatment caused Ms. Doe's mental health to deteriorate to the point where she began to harm herself, male officers stripped her naked and forced her into an anti-suicide smock. The smock the male officers forced Ms. Doe into was damaged and left one of Ms. Doe's breasts exposed.

25. Rather than help Ms. Doe, Baker officers strapped her into a restraint chair so she could do nothing to cover herself. While strapped into the restraint chair, Ms. Doe tried to adjust the ripped suicide smock to cover her exposed breast, but during that process, her other breast was exposed as well. Instead of covering her up, the officers then stared and laughed at her while her breasts were exposed.

26. As a survivor of human trafficking, this experience caused Ms. Doe substantial trauma.

27. While Ms. Doe was restrained with her breast fully visible, officers continued to walk by and ogle her through the window of her cell for hours.

¹⁶ The National Detention Standards are guidelines established by ICE that govern the conditions of confinement, program operations, and management expectations of ICE-related immigration facilities. Like all immigration detention centers that contract with ICE, Baker is obligated to abide by the 2019 National Detention Standards.

28. According to a whistleblower who worked as a nurse practitioner at Baker during this time, Baker officers showed a videotape of this incident—including the use of the damaged anti-suicide smock and the subsequent use of the restraint chair in response to Ms. Doe’s mental health emergency—at a Baker personnel meeting as a “good example” of a use-of-force incident.¹⁷

29. Ms. Doe brings this lawsuit to vindicate her rights and hold Baker and its personnel accountable for their unlawful conduct.

II. JURISDICTION AND VENUE

30. This action seeks to vindicate Ms. Doe’s rights under 42 U.S.C. § 1983.

31. This Court has subject matter jurisdiction over the claims alleged in this Complaint under 28 U.S.C. §§ 1331 (federal question) and 1343 (civil rights).

32. This Court has the authority to issue a declaratory judgment and grant the requested equitable relief under 5 U.S.C. § 706, 28 U.S.C. §§ 2201–2202 (Declaratory Judgment Act), and Federal Rules of Civil Procedure 57 and 65.

33. Personal jurisdiction and venue are proper in the U.S. District Court for the Middle District of Florida under 28 U.S.C. § 1391(e) and 5 U.S.C. § 703 because a substantial part of the events or omissions giving rise to Plaintiff’s claims occurred

¹⁷ Letter from Government Accountability Project to Hon. Richard J. Durbin, et al. (Nov. 14, 2024), <https://whistleblower.org/wp-content/uploads/2024/11/Nov-2024-Whistleblower-Disclosure-of-Nurse-Practitioner-Vera-Goodwin-re-Baker.pdf>.

within the District, and because Baker operates in the District at 1 Sheriff's Office Drive, Macclenny, FL 32063.

III. PARTIES

A. Plaintiff.

34. Plaintiff Ms. Ana Doe: Ms. Doe is a 33-year-old Colombian national. She is a survivor of human trafficking. Ms. Doe's trafficker stole her passport and immigration papers, then coerced her through physical abuse and threats against her and her family to commit thefts. Later, Ms. Doe was detained in immigration custody at Baker for two months from May through July 2023 before being released on bond.

B. Defendants.

35. Defendant Scotty Rhoden, in his official capacity: At all times material to this Complaint, Defendant Scotty Rhoden was the Sheriff of Baker County, Florida. He is the chief law enforcement official in Baker County and the final policymaker for the Baker County Sheriff's Office. In this position, he had direct authority over the Baker County Detention Center. Ms. Doe sues Sheriff Rhoden in his official capacity.

36. Defendant Lieutenant Sharon Youmans, in her individual capacity: At all times material to this Complaint, Defendant Lieutenant Sharon Youmans was an officer working at Baker. While employed at Baker, Lieutenant Youmans engaged in the abusive, harmful, and/or unlawful behavior detailed herein, and acted either

at the direction of Sheriff Rhoden, or with his knowledge, and/or acted in accordance with policies, customs, and practices promulgated by Sheriff Rhoden. Plaintiff sues Lieutenant Youmans in her individual capacity.

37. Defendant Dustin Williams, in his individual capacity: At all times material to this Complaint, Defendant Dustin Williams was a nurse practitioner who worked at Baker. Mr. Williams was employed by Baker and engaged in the abusive, harmful, and/or unlawful behavior detailed herein, and acted either at the direction of Sheriff Rhoden, or with his knowledge, and/or acted in accordance with policies, customs, and practices promulgated by Sheriff Rhoden. Plaintiff sues Defendant Williams in his individual capacity.

38. Defendant Officers John and Jane Smith 1-X, in their individual capacities: Defendant Officers John and Jane Smith 1-X (collectively, the “Officer Defendants”) are individuals whose names are known to Baker who engaged in the described conduct against Ms. Doe set forth in this Complaint. The Officer Defendants were employed by Baker throughout the relevant period and engaged in the abusive, harmful, and/or unlawful behavior detailed herein. The Officer Defendants acted either at the direction of Sheriff Rhoden, or with his knowledge, and/or acted in accordance with policies, customs, and practices promulgated by Sheriff Rhoden. Plaintiff sues the Officer Defendants in their individual capacities.

39. All Defendants, at all relevant times, were acting under color of state law.

IV. FACTUAL ALLEGATIONS

A. Baker Has a Long and Documented History of Unlawful and Abusive Treatment of Detained People.

40. Baker is a county jail run jointly by the Baker County Sheriff's Office ("BCSO") and the Baker County Corrections Management Corporation ("BCCMC"), which owns the facility.

41. Baker has operated in part as an immigration detention facility since 2009, when the BCSO entered into an Intergovernmental Service Agreement with ICE to detain individuals in ICE custody. This contract requires Baker to abide by the 2019 National Detention Standards.

42. Immigration detention is civil detention, not criminal detention. People who are held in ICE detention are not there to serve criminal sentences. Those detained in civil ICE detention are afforded more rights than those in criminal custody, and the conditions of civil detention must be non-punitive. *See Bell v. Wolfish*, 441 U.S. 520, 538 (1979).

43. Despite the civil detention standards and ICE's National Detention Standards that bind Baker's treatment of those in ICE detention, countless people held in immigration detention at Baker have reported that Baker personnel subjected them to a variety of punitive, abusive conditions and civil rights violations.

44. In July 2022, the Immigrant Action Alliance and numerous other immigration justice organizations jointly submitted a civil rights complaint to the Department of Homeland Security (“DHS”) Inspector General on behalf of multiple people detained at Baker.¹⁸ Among other things, this civil rights complaint reported that Baker personnel engaged in physical assault, medical neglect, verbal abuse, racialized harassment and targeting, negligence with respect to COVID-19 guidelines, and retaliation against people detained at Baker.

45. Also in July 2022, the ACLU of Florida alerted the ICE Field Office Director to the unlawful conditions at Baker that placed people’s lives in danger.¹⁹ The ACLU of Florida’s letter documented that Baker personnel illegally retaliated against people who exercised their protected right to engage in hunger strikes. It shed light on the unsanitary and inhumane living conditions at Baker. It described Baker personnel’s pattern and practice of medical neglect and lack or denial of translation services. And it detailed how Baker personnel repeatedly engaged in

¹⁸ Letter from Rebecca Talbot, Immigrant Action Alliance, et al., to Hon. Joseph V. Cuffari, DHS Inspector General (July 21, 2022), https://static1.squarespace.com/static/5a33042eb078691c386e7bce/t/62d95e2af761ff08f169367f/1658412594632/Public_Copy_Multi-Individual+CRCL+for+Baker+County+Sheriff%27s+Office+July+21%2C+2022_Redacted.pdf.

¹⁹ Letter from Katie Blankenship, ACLU of Florida, to Garrett Ripa, ICE Field Office Director (July 26, 2022), https://www.acluf1.org/sites/default/files/field_documents/07.26.2022.ltr_to_ice_re_baker_conditions.kb_1.pdf.

physical abuse, intimidation, harassment, and voyeurism against the people detained in their care.

46. In September 2022, another multi-individual civil rights complaint recited additional firsthand accounts from people detained at Baker documenting Baker personnel's unlawful, abusive, and inhumane treatment.²⁰

47. In September 2022, women who were detained at Baker started a letter-writing campaign sharing their experiences of horrific treatment at Baker, including voyeurism and denial of feminine hygiene products.²¹

48. In November 2022, the ACLU of Florida filed Prison Rape Elimination Act ("PREA") complaints on behalf of women detained at Baker, documenting how Baker personnel subjected women detained at Baker unlawful and inhumane treatment, including voyeurism.²²

49. In February 2023, the Department of Homeland Security's Office of Civil Rights and Civil Liberties ("CRCL"), one of DHS's accountability offices

²⁰ Letter from Katie Blankenship, ACLU of Florida, to Hon. Joseph V. Cuffari, DHS Inspector General, et al. (Sept. 13, 2022), https://www.aclufl.org/sites/default/files/crcl_complaint_-_baker_county_detention_center_-_final.pdf.

²¹ See Letter from Bobbeth Morgan to Baker County Detention Center (Sept. 3, 2022), <https://www.aclufl.org/en/voices-baker-bobbeth>; Letter from Samantha Lindsay to Baker County Detention Center (Sept. 8, 2022), <https://www.aclufl.org/en/voices-baker-samantha>; Letter from Hyacinth Bailey to Baker County Detention Center (Sept. 30, 2022), <https://www.aclufl.org/en/voices-baker-hyacinth>.

²² Letter from Katie Blankenship, ACLU of Florida, to Office of Inspector General et al. (Nov. 2, 2022), <https://www.aclufl.org/en/prison-rape-elimination-act-prea-complaint-baker-county-detention-center>.

responsible for investigating and resolving civil rights complaints, confirmed that they had investigated similar PREA concerns at Baker in September 2022, “and substantiated the PREA concerns at Baker.”²³

50. In May 2023, the ACLU of Florida filed a civil rights complaint that documented untreated mental health conditions and the unlawful and inhumane use of solitary confinement for people who are disabled.²⁴ Medical experts who reviewed individuals’ medical files and raised concerns about the lack of medical care and attention at Baker substantiated this complaint’s allegations.²⁵

51. In May 2023, a woman who was detained at Baker filed a sexual assault and trafficking suit against a Baker officer.²⁶ This Baker officer was subsequently convicted of sexual battery and sentenced to 25 years.²⁷

²³ Letter from Office for Civil Rights and Civil Liberties, U.S. Department of Homeland Security, to Katie Blankenship, ACLU of Florida (Feb. 6, 2023), https://www.aclufl.org/sites/default/files/field_documents/prea_crcl_response.pdf.

²⁴ Letter from Katie Blankenship and Maite Garcia, ACLU of Florida, to Dr. Ada Rivera et al. (May 4, 2023), <https://www.aclufl.org/en/letter-dhs-systemic-medical-neglect-baker-county-detention-center>.

²⁵ *Id.*

²⁶ Complaint, *Doe v. Baker County et al.*, 3:23-cv-00609 (M.D. Fla. Filed May 19, 2023), ECF No. 1.

²⁷ Allison Matthews, *Former Baker County Detention Deputy Sentenced to 25 Years Sexually Battering Inmate*, Action News Jax (May 5, 2024), <https://www.actionnewsjax.com/news/local/baker-county/former-baker-county-detention-deputy-sentenced-25-years-sexually-battering-inmate/PZPOCG2BWVDC3GDJQX3F2RDVX4/> (last visited Jan. 2, 2025).

52. In March 2024, DHS's CRCL office confirmed that it had identified "immediate concerns regarding the health and well-being of persons detained at Baker" and noted "serious problems in the areas of unnecessary and excessive uses of force, uses of segregation, language access and verbal abuse by staff" and that ICE needed to implement an action plan to address these urgent concerns.²⁸

B. Ms. Doe Is a Victim of Human Trafficking.

53. In 2015, Ms. Doe completed a bachelor's degree in social communications and journalism in Colombia. She came to the United States when she was 23 on a tourist visa.

54. While in Florida, a man offered Ms. Doe a job at his jewelry store and a place to stay, which she accepted.

55. One night, the man asked Ms. Doe to watch his jewelry, then staged a theft. Claiming Ms. Doe was responsible for the lost items, the man confiscated Ms. Doe's personal belongings, including her passport, wallet, and phone.

56. Over the next few years, the man abused and manipulated Ms. Doe. He forced her to learn how to steal jewelry. When Ms. Doe protested, he physically abused her and threatened her family.

²⁸ FOIA Response including Memorandum from CRCL to ACLU of Florida (Sept. 19, 2022), and Proposed Immediate Action Plan for Baker County Detention Center (Oct. 6, 2022), <https://www.aclufl.org/en/crclfoiaresponsereceived2-13-24>.

57. The trafficker repeatedly forced Ms. Doe to steal jewelry. Consequently, she was arrested by Miami police and charged with theft and robbery.

58. During Ms. Doe's trial, the trafficker continued his psychological abuse and manipulation. The trafficker threatened to kill Ms. Doe or her family if she spoke about the trafficker to the court.

59. Terrified, Ms. Doe remained silent and did not disclose at trial that the trafficker forced her to commit the charged crimes. She was sentenced to a year in prison.

60. After Ms. Doe was released, she married in 2019 and gave birth to her son on June 8, 2019. Ms. Doe describes her son as "the best thing that has happened to her."

61. However, the psychological and physical abuse Ms. Doe suffered at the hands of her trafficker continued to weigh heavily on her. A licensed mental health counsellor diagnosed her with PTSD, anxiety, and depression in 2020.

C. ICE Detains Ms. Doe at Baker in 2023.

62. In early 2022, Ms. Doe and her husband began divorce and custody proceedings. Her husband served a court order temporarily limiting Ms. Doe's custody of her son to supervised visitation.

63. One day, Ms. Doe picked up her son from a doctor's appointment and took him to get ice cream. Police arrested her for violating the temporary court order.

64. The police took Ms. Doe to Turner Guilford Knight Correctional Center ("Turner") in August 2022.

65. Ms. Doe remained detained at Turner through April 2023, when she was released into ICE custody and transported to Baker on or around May 12, 2023.

66. Ms. Doe is a native Spanish speaker who had little English fluency when she was detained in Baker. Yet the nurse at Baker who conducted Ms. Doe's intake incorrectly recorded English as her best-spoken language.

67. Baker personnel conducted Ms. Doe's initial facility intake entirely in English. Baker's intake failed to document Ms. Doe's limited English proficiency or her need for translation services. At no point during her intake did Baker personnel offer Ms. Doe a translator or printed materials she could understand. Ms. Doe therefore had limited understanding of the questions asked of her.

68. Baker's failure to provide a translator violated the 2019 National Detention Standards, which set forth guidelines for the conditions of confinement for detained people in ICE facilities.

69. Baker is contractually bound to abide by the 2019 National Detention Standards per its Intergovernmental Services Agreement with ICE.

70. The 2019 National Detention Standards obligate facilities to provide “language interpretation and translation services” to detained people with limited English proficiency in “all aspects of detention, including but not limited to intake.”²⁹

71. Because Baker personnel failed to conduct the intake in a language Ms. Doe could understand, Baker personnel also failed to accurately record her physical and mental health needs. Despite her medically diagnosed PTSD, depression, and anxiety, her medical screening form incorrectly identified her as having no immediate mental health needs or problems. Her medical screening form similarly failed to document her diagnosed chronic hypothyroidism.

72. The medical screening form also incorrectly stated that Ms. Doe had never “received mental health treatment for psychiatric illness, including depression, anxiety, emotional problems, or anything similar.” It incorrectly stated that she was not “[currently] prescribed psychiatric medications.” It incorrectly stated that she had no “mental health concerns that need to be addressed by a Behavioral Health Professional.” And it incorrectly stated that Ms. Doe had no “history of being sexually abused or victimized.”

²⁹ ICE, National Detention Standards for Non-Dedicated Facilities, Foreword (2019), <https://www.ice.gov/doclib/detention-standards/2019/nds2019.pdf>.

D. Defendants Improperly Subject Ms. Doe to Solitary Confinement After She Asks for a Menstruation Hygiene Product.

73. On May 25, 2023, a Baker officer entered Ms. Doe's housing pod and informed the women that they were going outside for recreation. He escorted the group into the hallway.

74. Ms. Doe was menstruating, so she asked the officer in English for a "bathroom." She explained to him in Spanish that she needed feminine hygiene products.

75. The officer responded in English, so Ms. Doe did not understand what the officer said to her, and accordingly, she did not respond.

76. When Ms. Doe did not respond, the officer became irate and began to speak faster. The officer then began to yell at Ms. Doe. Ms. Doe still could not understand his English commands.

77. Three other officers, including at least one sergeant, then involved themselves in the incident. At no point did any Baker officer or any other Baker personnel attempt to use a translation service or speak to Ms. Doe in Spanish.

78. Ms. Doe tried to explain to the officers that she needed to retrieve feminine hygiene products. She told the officers that she was being denied the right to use the bathroom. She stated that she was facing verbal abuse simply for seeking to exercise that right. She requested to speak with an immigration officer. But the

Baker officers made no effort to understand Ms. Doe or to find a way to communicate in a manner she could understand.

79. Instead, without getting her menstruation hygiene products, the officers handcuffed Ms. Doe, grabbed her arms, and forcibly escorted her to a solitary cell in the booking area, placing her in administrative segregation for charges of “disobeying [a] verbal or written order,” “conduct that disrupts,” and “interfering with a staff member.”

80. At no point during this encounter was Ms. Doe a threat to herself, the officers, or other detained individuals, as the 2019 National Detention Standards require before officers resort to employing segregation (also known as solitary confinement). Her protest was verbal and not physical, and she was not aggressive.

E. Baker Improperly Places Ms. Doe in Solitary Confinement and Denies Her Essential Mental Health Care.

81. Due to the May 25, 2023, incident, officers placed Ms. Doe in an isolation holding cell in the facility’s booking area while they processed her for administrative segregation. People detained at Baker refer to the booking area as the “punishment area” because of the appalling condition of these cells.

82. Florida congressman Maxwell Frost, after visiting Baker in 2024, described the administrative segregation cells as “horrible,” with “disgusting” pools of standing water and foam pieces so thin that he couldn’t “even call it a mattress”

used as bedding.³⁰ After this visit, the congressman called for the Baker facility to be shut down and stated, “I saw conditions that no human should have to live in.”

83. Ms. Doe’s cell was small, filthy, and dark, and it did not have a mattress or blankets.

84. Ms. Doe immediately felt unwell when she was placed in the cell. She asked for a nurse. Baker personnel refused.

85. Baker personnel similarly continued to ignore her requests for feminine hygiene products.

86. Instead of assisting Ms. Doe or monitoring her well-being, an officer responded to her requests by taunting her, holding up two fingers and saying “two days” to tell Ms. Doe that she would remain in the isolation cell for two days.

87. When Ms. Doe realized she would be trapped in the cell for days, she had a panic attack. She began crying, struggled to breathe, and started vomiting.

88. Ms. Doe, who was menstruating, began bleeding through her clothing, as Baker guards still refused to provide her with feminine menstruation products.

89. The officers witnessing Ms. Doe’s panic attack and rapidly deteriorating physical condition did not assist her or call for medical attention.

³⁰ Dan Scanlan, Congressman seeks shutdown of Baker County ICE center, *Jax Today* (Nov. 19, 2024), <https://jaxtoday.org/2024/11/19/ice-shutdown-baker-county>.

Instead, they laughed at her. Then, they ignored her, even covering the cell door's window.

90. Despite her history of PTSD, anxiety, and depression, Baker personnel concluded that it was appropriate to clear Ms. Doe for administrative segregation.

91. Because Baker personnel failed to provide a translator at initial intake, Ms. Doe's electronic medical record incorrectly indicated that she had never been diagnosed with a major mental illness. It also improperly indicated that Ms. Doe had no mental health needs requiring special accommodation, nor any mental health needs to be considered if confined in isolation.

92. The nurse who medically cleared Ms. Doe for confinement did not check a box on the relevant paperwork stating: "Notify Mental Health for Confinement." As such, Baker personnel improperly placed Ms. Doe in solitary confinement after the May 25 incident. Additionally, because this box was not checked, once Ms. Doe was placed in solitary confinement, she did not receive the benefit of follow-up mental health care and monitoring, nor "enhanced opportunities for in-cell and out-of-cell therapeutics activities and additional unstructured out-of-cell time," as dictated by the 2019 National Detention Standards.

93. Ms. Doe continued attempting to alert the officers to her condition and seeking help. She banged on the door and called out that she needed a doctor.

94. After hours of Baker officials ignoring or rejecting her pleas for assistance, Ms. Doe became desperate. Seeing no other option to gain assistance, she decided to break the cell's fire sprinkler. The sprinkler sprayed dark, foul liquid all over Ms. Doe and the cell.

95. Two Baker officers entered the cell. They took Ms. Doe by the arms and led her down the hall. Ms. Doe did not resist. She was relieved to be free from the cell, and she believed she was finally going to receive medical attention.

96. But the Baker officers did not take her to the medical clinic or to see a doctor. Nor did they provide her feminine hygiene products. They did not even give her a towel to clean off the liquid from the sprinkler.

97. Instead, they left Ms. Doe in a different isolation cell.

98. Alone in her new cell, Ms. Doe removed her dirty, soaked shirt and tried to use it to clean off her face and body. While she was attempting to dry herself, Officer Defendants returned to her cell with a restraint chair.³¹ Despite the fact that Ms. Doe was not a threat to herself or others, Officer Defendants forced Ms. Doe into the restraint chair while she was still only partially dressed, wearing only a bra and pants, and they rolled her into a nearby bathroom.

³¹ Upon information and belief, the Officer Defendants involved in this incident included Deputies Alissa Behrens and Chelsea Higginbotham.

99. Distraught, exposed, and wet in the cold facility, Ms. Doe sobbed uncontrollably while she was restrained. No Baker staff member made any effort to cover Ms. Doe. Instead, for the next hour, officers walked by the bathroom window and leered at a cold, shirtless, crying Ms. Doe.

100. During this time, a nurse checked Ms. Doe's vitals but ignored Ms. Doe's requests for medical treatment.

101. Officer Defendants placed Ms. Doe in the restraint chair solely to punish her for breaking the sprinkler head, as articulated in the official incident report, which states that she was "placed into the restraint chair for her disruptive actions." Ms. Doe was not a threat to herself or to others, and she complied with the officers who removed her from the cell.

102. This use of the restraint chair as punishment was impermissible. 2019 National Detention Standard 2.8, which governs the use of force and restraints, makes clear that "[u]nder no circumstances shall force be used to punish a detainee."³² However, detention centers like Baker have long ignored this directive, using restraint chairs "as punishment for minor acts of non-compliance, contrary to U.S. and international standards on the use of restraints."³³

³² ICE, National Detention Standards for Non-Dedicated Facilities, 2.8(II)(1) (2019), <https://www.ice.gov/doclib/detention-standards/2019/nds2019.pdf>.

³³ Amnesty International, United States of America: The Restraint Chair: How Many More Deaths?, 1, 4 (2002), <https://www.amnesty.org/en/wp-content/uploads/2021/06/amr510312002en.pdf>; *see also* Tom Dreisbach, Government's Own

103. At the time of the incident, Sheriff Rhoden had already been made aware—through the 2019 Detention Standards, as well as via complaints and a CRCL investigation—of Baker’s pattern and practice of improper and excessive use of force, including through the punitive use of restraint chairs and solitary confinement.

104. Ms. Doe’s experience in the isolation cell and restraint chair left her deeply shaken. After Officer Defendants released her from the restraint chair and returned her to the isolation cell, Ms. Doe lost her ability to eat because she became so depressed.

105. Ms. Doe met with Baker’s mental health care provider, Defendant Williams, a nurse practitioner, the day after her release from the restraint chair. This was the first time since arriving at Baker that she met with a mental health care provider.

106. Using a translator, Ms. Doe told Defendant Williams that she felt overwhelmed, had anxiety and PTSD, had a high level of diagnosed depression, had previously been prescribed the antipsychotic medication Seroquel, had received outpatient therapy at a trauma center, and had been a victim of trafficking and

Experts Found ‘Barbaric’ and ‘Negligent’ Conditions in ICE Detention, NPR (Aug. 16, 2023), <https://www.npr.org/2023/08/16/1190767610/ice-detention-immigration-government-inspectors-barbaric-negligent-conditions>; Use of Restraint Chair Linked to 20 Recent Jail Deaths, Equal Justice Initiative (Feb. 17, 2020), <https://eji.org/news/use-of-restraint-chair-linked-to-20-recent-jail-deaths>.

physical abuse. Ms. Doe also relayed during this time that she had been hospitalized for three days for PTSD and had also attended outpatient treatment at a trauma center. Defendant Williams observed that Ms. Doe was “very anxious,” “extremely tearful and upset,” and was experiencing hopelessness, decreased sleep, and decreased appetite.

107. Yet Defendant Williams did not make any meaningful effort to treat Ms. Doe’s mental health conditions as he was required to do.

108. Instead, Defendant Williams criticized Ms. Doe. He described her as “arrogant” and opined that “she was exhibiting very manipulative behavior.” He told Ms. Doe that she “could be referred for discussion of possible medication for anxiety,” but then described her behavior as “more manipulative than anxious.”

109. Defendant Williams also blamed Ms. Doe for her confinement in the restraint chair. He instructed the nursing staff to “encourage control of [Ms. Doe’s] behavior and following rules of facility to avoid further post use of force.”

110. These experiences exacerbated Ms. Doe’s depression and her inability to eat.

111. Baker’s failures to appropriately identify and address Ms. Doe’s complex mental health needs—both through Defendant Williams as well as other Baker personnel responsible for Ms. Doe’s healthcare—aligns with DHS’ CRCL

office's findings.³⁴ Indeed, following its investigation into a "large number" of serious allegations, in its October 6, 2022 proposed action plan to address its "significant concerns regarding detainee safety" at Baker, the CRCL office identified that Baker personnel routinely fails to document or adequately care for chronic and/or complex medical conditions. The CRCL report ultimately concluded that "ICE should not admit or transfer any new detainees with chronic and/or complex medical care needs to Baker" until such concerns were remedied.

112. Given this, Defendant Rhoden and Officer Defendants were on notice for at least a year that Baker had extreme deficiencies in the healthcare provided to detained people at Baker. However, despite this notice, Baker, Defendant Rhoden, and Officer Defendants failed to cure the issues outlined in the CRCL action plan, instead allowing a pattern and practice of deliberate indifference to medical needs to run rampant at the facility.

F. Baker Improperly Extends Ms. Doe's Time in Solitary Confinement.

113. After multiple days in isolation, Lieutenant Sharon Youmans found Ms. Doe guilty for three charges related to her "offense" of misunderstanding the officer on May 25, 2023. As part of her disciplinary review, she determined that Ms. Doe's punishment was satisfied by her three prior days in the isolation cell.

³⁴ Press Release, ACLU of Florida, Federal Government Confirms Wide Range of Abuses at Baker County Detention Center, <https://www.aclufl.org/en/press-releases/federal-government-confirms-wide-range-abuses-baker-county-detention-center>.

114. However, in a separate disciplinary action for breaking the sprinkler, Lieutenant Youmans sentenced Ms. Doe to an additional **30 days** of solitary confinement.

115. Ms. Doe was not permitted to attend this disciplinary hearing in person. Instead, Ms. Doe was led into a room with two Officer Defendants, where the hearing was conducted in English by phone call. Ms. Doe was not provided with any translation services. During this hearing, the Officer Defendants read her two charges, declared her guilty, and announced her sentence of 30 days. She was not provided an opportunity to speak or to defend herself.

116. After the hearing concluded, the Officer Defendants provided Ms. Doe with only an English-language document informing her of her 30-day disciplinary solitary confinement sentence. Baker did not provide her with any translated materials describing the offense, the sentence, or the evidence relied upon in reaching the sentence.

117. In extending Ms. Doe's time in solitary confinement, Baker personnel ignored the severe effect that the initial isolation had on Ms. Doe's mental health. At the time, Ms. Doe was unable to eat, and she had previously informed a medical provider about her serious mental health concerns and previous diagnoses. Yet in the hearing form extending her isolation by 30 days, Lieutenant Youmans noted that a nurse indicated that "she has no mental health issues noted." Notably, this

erroneous comment came after Ms. Doe had a panic attack, after she informed Defendant Williams of her mental health history and ongoing concerns, and after she began refusing food.

G. Ms. Doe Is Denied Access to Counsel While in Solitary Confinement.

118. During the first two weeks during her time in solitary confinement, Baker personnel denied Ms. Doe the ability to speak with the attorneys responsible for managing her ongoing custody and immigration cases. At points, Ms. Doe would request to speak to her attorney dozens of times a day. Baker guards refused, claiming that she was not allowed phone access while in solitary confinement.

119. While she was in solitary confinement, the father of Ms. Doe's child requested full custody of Ms. Doe's son, and Ms. Doe was particularly concerned about the status of this case. Despite Ms. Doe's repeated requests to speak to her lawyer about the status of her custody case, Baker personnel refused her requests to use the telephone to call her attorney during the first two weeks that she was in solitary.

120. Instead, one nurse told Ms. Doe that her son would be better off without her.

121. After two weeks, an ICE officer told her that she could use a phone if she met his demands to end her hunger strike and resume eating, which she then did.

122. Baker personnel also refused to allow Ms. Doe to appear for video conferences in connection with the ongoing custody dispute.

123. In one instance, Ms. Doe's own attorney called Baker. The attorney requested that Baker allow Ms. Doe to attend a virtual video-hearing for the custody case. Baker personnel refused. Ms. Doe missed the hearing.

124. Ms. Doe's inability to participate in the custody dispute over her son left her distraught. She often cried for hours, fearing that missing mandatory custody hearings would cause her to lose her son.

125. While in solitary confinement, Baker personnel also revoked Ms. Doe's access to the electronic tablet that those in detention rely on for written communications. Without this tablet and without access to phones, Ms. Doe was left without practical means to communicate with her attorneys.

126. By revoking her access to the electronic tablet, Baker personnel also deprived Ms. Doe of any means to file grievances about her denial of access to counsel—or any other aspects of her abusive treatment—given that such grievances are filed electronically via those tablets. She lacked the ability to file grievances about the horrific conditions of the cell and the abusive and antagonistic behavior of the guards.

127. The Baker staff denied Ms. Doe access to the electronic tablet for the entire duration of her time in solitary confinement.

128. Baker personnel's repeated denials of Ms. Doe's requests to contact her attorney via telephone violate the 2019 National Detention Standard 2.9, which dictates that "[a]ll detainees, including those in disciplinary segregation, shall be permitted to place calls to attorneys, other legal representatives, courts, and government offices."³⁵

129. Furthermore, Baker personnel violated the 2019 National Detention Standards by more broadly disallowing Ms. Doe to access the phone. Instead, while the Standards allow reasonable restriction of phone access for those in solitary confinement in enumerated scenarios, Standard 2.9 also requires that "[i]n such instances, staff must clearly document why such restrictions are necessary to preserve the safety, security, and good order of the facility. Such documentation shall be placed in the detainee's detention file or be maintained in a retrievable electronic format."³⁶

H. Ms. Doe's Physical and Mental Health Further Deteriorates While in Solitary Confinement.

130. Ms. Doe became severely depressed during her 30-day sentence in solitary confinement, due to the lack of mental health services and the appalling conditions. She suffered from anxiety caused by her limited access to counsel and

³⁵ ICE, National Detention Standards for Non-Dedicated Facilities, 2.9(II)(W) (2019), <https://www.ice.gov/doclib/detention-standards/2019/nds2019.pdf>.

³⁶ *Id.*

her fears that she would lose custody of her son while in solitary confinement. Her depression became so severe that she began to hear voices.

131. During this period, Ms. Doe experienced extreme loss of appetite, often going days at a time without eating. When she could eat, her anxiety would cause her to throw up.

132. In response, Baker personnel placed Ms. Doe on hunger-strike status and briefly admitted her to the medical unit at the start of her 30-day sentence in isolation. But Baker personnel failed to follow the hunger strike protocol's mandated mental health assessment and treatment.

133. Instead of following protocol and helping her, Baker personnel taunted Ms. Doe. When she was finally able to eat, the officers who delivered her food often pretended to drop it on the ground or pulled the food tray back from the slot of the cell door rather than pass it to Ms. Doe. Afterwards, the officers looked at each other and laughed.

134. On June 2, 2023, about a week into her 30-day sentence, Ms. Doe again met with Defendant Williams. He continued to dismiss Ms. Doe's reports of PTSD and anxiety and her requests for medication. He once again described Ms. Doe as "very manipulative," "very angry and demanding," and "passive-aggressive." His notes from this meeting suggest that he dismissed her claims without any serious consideration of her mental health status.

135. Two weeks passed before Ms. Doe was able to see another medical provider about mental health treatment. On or about June 14, 2023, Ms. Doe met with a different nurse practitioner who immediately prescribed a medication that treats depression, anxiety, and nerve pain. But Ms. Doe had an adverse reaction to this medication, so it was discontinued on June 26, 2023.

136. Ms. Doe was not prescribed an alternative medication until almost a month later, on July 21, 2023.

I. In Response to Her Mental Health Crisis, Male Officers Strip Ms. Doe, Strap Her to a Restraint Chair with Her Breast Exposed, and Laugh at Her.

137. By June 23, 2023, Ms. Doe had been in solitary confinement for more than four weeks. Her physical and mental health had declined significantly during this time.

138. Ms. Doe grew distraught that evening and began to harm herself. She began banging her head on the door of her cell.

139. At least four officers responded to Ms. Doe's mental health crisis. But none of these officers sought interpretation services to speak with Ms. Doe to understand or address the concerns that had led her to harm herself.

140. Instead, the officers aggressively forced Ms. Doe into a restraint chair. In the process, at least one officer grabbed her by the neck and jaw, leaving fingernail marks.

141. The officers then left Ms. Doe alone in her cell, strapped in the restraint chair. She wept openly and uncontrollably.

142. After some time, the officers returned and wheeled a visibly shaken Ms. Doe to a medical examination room. Baker personnel attempted to connect her with an interpretation service for the first time since she began to harm herself. The translation services connected on the second attempt.

143. Sometime during the conversation with the interpreter, Ms. Doe expressed that her life made no sense. Based on that comment, officers placed Ms. Doe on suicide watch.

144. Officers then wheeled Ms. Doe to another cell, where they released her from the restraint chair. Officers allowed her to use the restroom. Then, five Officer Defendants—two women and three men—forcibly grabbed Ms. Doe, pinned her to a bed, and ripped off all her clothes, including her bra and underwear.³⁷

145. No one explained to Ms. Doe what was happening, or why she was being stripped naked. Ms. Doe, a victim of human trafficking and domestic violence, screamed that men should not be handling her or removing her clothes. But the male

³⁷ Upon information and belief, the Officer Defendants involved in this incident may include Jennifer Wilson, Keller Smith, Christopher Martin, Michael Boyette, and/or Andrew Ryan Lassiter. Upon information and belief, Defendant Lieutenant Youmans may have also been involved in this incident.

officers remained. They stared and laughed at Ms. Doe while her breasts were exposed. Ms. Doe felt as though she was sexually assaulted.

146. The Officer Defendants forced Ms. Doe into an anti-suicide smock that was ripped and hung down, exposing her bare breast.

147. When the Officer Defendants left the cell, Ms. Doe was distraught and soon began hitting her head against the plumbing fixture in her cell.

148. The Officer Defendants returned and strapped her back into a restraint chair, still wearing the torn anti-suicide smock. They left her breast exposed. With her arms fastened to the chair, Ms. Doe was unable to adjust the smock to cover herself.

149. While her breast remained exposed, male Officer Defendants walked by the window of her cell to ogle her and mock her.

150. Ms. Doe was left strapped to the restraint chair for approximately three hours before she was released and placed in an anti-suicide cell.

151. In total, Ms. Doe spent approximately four hours that evening in a restraint chair, exposed, humiliated, and degraded.

152. The Officer Defendants' manhandling of Ms. Doe that evening left her with contusions and marks all over her body. But Baker personnel took no photographs of those marks, and Baker personnel wrote in Ms. Doe's medical records that she caused those injuries herself.

153. Baker personnel videotaped part of Ms. Doe’s mistreatment and their use of force against her.

154. As the Baker whistleblower recently disclosed, during an all-staff meeting shortly after this incident, Officer Defendants played video footage of Ms. Doe in the restraint chair with her naked breast exposed. Officer Defendants described the video as demonstrating a “good example” of a use-of-force incident.³⁸ Despite Ms. Doe’s obvious distress in the video, the officers present at the meeting laughed at her again.

155. That Officer Defendants used this incident as an example of a good use of force aligns with the CRCL office’s prior identification of “serious problems in the areas of unnecessary and excessive uses of force [and] uses of segregation.”³⁹ Indeed, since at least April 2022, Sheriff Rhoden—through the CRCL’s Expert Recommendation Memorandum to ICE—should have been on notice and had existing knowledge of Baker’s ongoing deficiencies in its improper use of force

³⁸ See Letter from Government Accountability Project to Hon. Richard J. Durbin, et al. (Nov. 14, 2024), at 2–3, <https://whistleblower.org/wp-content/uploads/2024/11/Nov-2024-Whistleblower-Disclosure-of-Nurse-Practitioner-Vera-Goodwin-re-Baker.pdf> (evidencing pattern and practice of various compliance failures in Baker); see also “Results of an Unannounced Inspection of Baker County Sheriff’s Office in Macclenny, Florida,” U.S. Department of Homeland Security Office of Inspector General (Sept. 27, 2024), <https://www.oig.dhs.gov/sites/default/files/assets/2024-10/OIG-24-63-Sep24.pdf> (acknowledging Baker staff’s lack of compliance to NDS use-of-force standards).

³⁹ Press Release, ACLU of Florida, Federal Government Confirms Wide Range of Abuses at Baker County Detention Center, <https://www.aclufl.org/en/press-releases/federal-government-confirms-wide-range-abuses-baker-county-detention-center>.

(including restraint chairs) and improper use of solitary confinement. Furthermore, this recommendation came on the heels of a CRCL investigation responding to numerous complaints about Baker, which further confirms Sheriff Rhoden's longstanding knowledge of this impermissible practice of improper use of force at Baker.

J. Baker Falsifies Ms. Doe's Medical Records to Indicate That She Refused Medical Care.

156. On June 24, 2023, Ms. Doe met again with Baker's mental health provider, Defendant Williams. Defendant Williams was once again dismissive and disdainful toward Ms. Doe. Nevertheless, he finally agreed to prescribe her medication to address her anxiety and depression and to target her symptoms of insomnia, loss of appetite, lack of interest, crying spells, impulse control, racing thoughts, and chronic pain.

157. At the conclusion of the appointment, Defendant Williams downgraded Ms. Doe from suicide watch to mental health watch. He indicated that she would be reassessed by a mental health therapist in two days.

158. Ms. Doe completed a follow-up appointment on June 27, 2023. But Baker personnel did not schedule her for another appointment to address her serious and ongoing mental health needs until July 21, 2023—nearly a month later.

159. Ms. Doe's medical records falsely indicate that she refused "to be assessed by mental health [f]or [sic] level of care needs" during a scheduled

appointment on July 5, 2023. However, Ms. Doe did not refuse her July 5, 2023 appointment. Rather, she was never given the opportunity to attend the potential July 5, 2023 appointment.

160. The former nurse practitioner at Baker who recently came forward as a whistleblower reported that Baker's medical team had a practice of falsifying medical refusals to avoid actually seeing people for appointments.⁴⁰

161. Ms. Doe's medical records include a number of such falsified refusal of treatment forms.

K. Baker's Horrific Conditions Exacerbate Ms. Doe's Distress.

162. Ms. Doe experienced consistently unsanitary and inhumane conditions throughout her time at Baker, exacerbating the mistreatment and abuse described above.

163. Baker personnel regularly failed to provide her with feminine menstruation products.

164. In addition to the incident described earlier relating to Ms. Doe's initial encounter with solitary confinement, on July 18, 2023, Baker officials again denied Ms. Doe extra feminine menstrual products to handle a heavy menstrual cycle. The

⁴⁰ Letter from Government Accountability Project to Hon. Richard J. Durbin, et al. (Nov. 14, 2024), at 29–34, <https://whistleblower.org/wp-content/uploads/2024/11/Nov-2024-Whistleblower-Disclosure-of-Nurse-Practitioner-Vera-Goodwin-re-Baker.pdf>

officials told Ms. Doe that she needed to seek medical approval to determine if she truly needed a special allotment.

165. Baker personnel also denied Ms. Doe adequate access to the shower. This was especially egregious during her 30-day sentence in solitary confinement, where officers only permitted her to shower late at night after she begged.

166. Baker personnel also repeatedly served Ms. Doe cold, inedible, and/or nutritionally deficient food. On one occasion, Baker officials served her a meal with spoiled food, which caused her to vomit for days.

167. Baker personnel housed Ms. Doe in filthy, cold cells. The solitary confinement cell she was initially placed in lacked even a mattress.

168. Baker personnel also issued Ms. Doe dirty, ripped, and unhygienic clothing. The clothing left her freezing and caused adverse skin reactions. The clothing smelled like it had not been washed. When Ms. Doe asked for clean clothes, Baker personnel denied her request.

L. Ms. Doe Brings Suit.

169. In total, Ms. Doe was detained at Baker for over two months. Ms. Doe was released from Baker on July 27, 2023, when an immigration judge granted her bond.

170. All told, Ms. Doe's experience at Baker and the abuse she endured at the hands of various officers caused her extreme and enduring trauma and distress,

which she still carries with her today. She remains tormented by memories of her time there, and her PTSD, depression, and anxiety have worsened since her time at Baker. She attends therapy every two weeks to treat these conditions. She fears being around men and being in small spaces. She frequently has nightmares, palpitations, severe memory loss, and she has trouble concentrating. She constantly feels tired, scared, and stressed. Since her time at Baker, she has become distrustful, which has put a strain on her relationships with loved ones.

171. Ms. Doe, who continues to reside in the United States while her immigration case remains pending, lives in fear that she will be re-detained by ICE. This fear has grown over the past few months, given ICE's increased use of immigration detention for people who have pending immigration cases and criminal records.⁴¹ If she were to be re-detained, there is a good chance that she would be sent back to Baker, as Baker is one of the two ICE detention facilities that house women in Florida.⁴² Ms. Doe reasonably fears being re-detained and re-abused at Baker in the future.

⁴¹ ICE Miami, Largest joint immigration operation in Florida history leads to 1,120 criminal alien arrests during weeklong operation (May 1, 2025), <https://www.ice.gov/news/releases/largest-joint-immigration-operation-florida-history-leads-1120-criminal-alien-arrests>.

⁴² As of January 2025, Baker was the only ICE detention facility in Florida that housed women. ICE recently began holding women at the Broward Transitional Center, as well. For a brief time since January, ICE temporarily held women at Krome before they were transferred to other facilities, but upon information and belief, that is no longer the case.

172. Ms. Doe therefore brings this lawsuit against Baker and the responsible personnel to vindicate her rights, hold Baker accountable for its abusive, unlawful conduct, and to compel Baker and its personnel to stop their egregious actions and abuse of people in their care.

V. CAUSES OF ACTION

Count I

42 U.S.C. § 1983 - Violation of the Fourth Amendment: Bodily Privacy *(Against Sheriff Scotty Rhoden and Officer Defendants)*

173. Ms. Doe realleges and incorporates by reference the allegations of all the preceding paragraphs, and specifically paragraphs 8 to 15, 18, 24 to 28, 47 to 49, and 139 to 157, as if fully set forth herein.

174. Ms. Doe has a Fourth Amendment right to bodily privacy.

175. This includes a clearly established right against compelled nudity absent a legitimate justification.

176. There was no legitimate justification for the Officer Defendants' decision to strip Ms. Doe, restrain her in a manner that exposed her breast, and subsequently ogle her exposed body over the course of hours.

177. There was similarly no legitimate justification for Officer Defendants to play a video recording of the incident, including depictions of Ms. Doe's exposed body, to Baker personnel at a subsequent date.

178. The Officer Defendants acted under color of state law when they exposed Ms. Doe's breast, restrained her so that she could not cover herself, and then ogled her body while she was restrained. The Officer Defendants acted under color of state law when they recorded and re-played the video of Ms. Doe's bare breast to a wider audience without her consent or knowledge.

179. Exposing Ms. Doe's breast while she was in the restraint chair was objectively unreasonable and constitutes a violation of Ms. Doe's Fourth Amendment rights. Similarly, broadcasting a video showing Ms. Doe's exposed body without her permission or knowledge constitutes an unreasonable violation of Ms. Doe's clearly established Fourth Amendment right to bodily privacy.

180. Upon information and belief, the Officer Defendants acted pursuant to customs, policies, and procedures encouraged and perpetuated by Sheriff Scotty Rhoden. As documented in the Statement of Facts section above, many individuals who have been detained at Baker have reported similar Prison Rape Elimination Act violations, demonstrating the culture and pattern of such abuse at Baker, that goes unprimanded.

181. The policies and customs perpetuated by Sheriff Scotty Rhoden at Baker, as well as his failure to adopt clear policies and failure to properly train Officer Defendants, were each a direct and proximate cause of the constitutional deprivations imposed upon Ms. Doe.

182. As a direct and proximate result of Defendants' unlawful actions, Ms. Doe endured and continues to endure pain, suffering, and irreparable harm.

Count II

42 U.S.C. § 1983 - Violation of the Fourteenth Amendment: Excessive Force
(Against Sheriff Scotty Rhoden and Officer Defendants)

183. Ms. Doe realleges and incorporates by reference the allegations of all the preceding paragraphs, and specifically paragraphs 2 to 5, 18, 24 to 28, 40 to 44, 52, 94 to 104, and 139 to 157, as if fully set forth herein.

184. Ms. Doe has a Fourteenth Amendment right to due process.

185. This includes a right against the use of excessive force.

186. The punitive use of a restraint chair against a compliant, non-resisting detainee is an unconstitutional use of excessive force.

187. The Officer Defendants acted under color of state law on or around May 25, 2023, when they forced Ms. Doe into a restraint chair after she broke the sprinkler head in her solitary confinement cell.

188. This use of the restraint chair was punitive: Ms. Doe was compliant and was not a threat to anyone when they employed the use of force. Therefore, this use of the restraint chair was objectively unreasonable and an unconstitutional use of excessive force in violation of Ms. Doe's clearly established rights under the Fourteenth Amendment.

189. Upon information and belief, the Officer Defendants acted pursuant to customs, policies, and procedures encouraged and perpetuated by Sheriff Scotty Rhoden.

190. As documented in the Statement of Facts section above, other individuals who have been detained at Baker have reported similar use-of-force violations, demonstrating the culture and pattern of such abuse at Baker, that seemingly goes unreprimanded.

191. The policies and customs perpetuated by Sheriff Scotty Rhoden at Baker, as well as his failure to adopt clear policies and his failure to properly train Officer Defendants, were each a direct and proximate cause of the constitutional deprivation imposed upon Ms. Doe.

192. As a direct and proximate result of Defendants' unlawful actions, Ms. Doe endured and continues to endure pain, suffering, and irreparable harm.

Count III

42 U.S.C. § 1983 - Violation of the Fourteenth Amendment: Procedural Due Process

(Against Sheriff Scotty Rhoden, Officer Defendants, and Lieutenant Youmans)

193. Ms. Doe realleges and incorporates by reference the allegations of all the preceding paragraphs, and specifically paragraphs 2 to 5, 18 to 20, 23, and 67 to 117, as if fully set forth herein.

194. Ms. Doe has a Fourteenth Amendment right to due process.

195. This includes a right to sufficient process before punitive placement in solitary confinement, including a due process hearing that complies with constitutional requirements.

196. The process Ms. Doe was due includes advance written notice of the charges against her, an opportunity to call witnesses and present documentary evidence, and a written statement by the factfinder outlining the evidence relied upon and the reasons for the disciplinary action taken. *Wolff v. McDonnell*, 418 U.S. 539, 563–67 (1974).

197. The Officer Defendants acted under color of state law on or around May 27, 2023, when they convened a “disciplinary hearing” at 11:13 p.m. that resulted in Ms. Doe’s 30-day sentence in solitary confinement. Ms. Doe was denied any ability to participate in the hearing and present a defense.

198. The Officer Defendants did not provide Ms. Doe with advance written notice of the claimed violation.

199. The Officer Defendants did not provide Ms. Doe with the opportunity to call witnesses or present documentary evidence in her own defense. The Officer Defendants also failed to provide Ms. Doe with any translation services that would allow her to understand the proceedings.

200. The Officer Defendants did not appropriately provide Ms. Doe with a written statement from the factfinders as to the evidence they relied upon in reaching

the 30-day sentence for disciplinary segregation. To the extent that Baker officials provided Ms. Doe with post-hearing forms, they were in English, despite the hearing form's recognition that Ms. Doe cannot read or understand English.

201. The Officer Defendants' failure to provide due process to Ms. Doe was objectively unreasonable and violated her clearly established Fourteenth Amendment right to procedural due process.

202. Upon information and belief, the Officer Defendants acted pursuant to customs, policies, and procedures encouraged and perpetuated by Sheriff Scotty Rhoden.

203. As documented in the Statement of Facts section above, many individuals who have been detained at Baker have reported similar abuses related to Baker's improper use of solitary confinement, demonstrating the culture and pattern of such abuse at Baker, that goes unprimanded.

204. The policies and customs perpetuated by Sheriff Scotty Rhoden at Baker, as well as his failure to adopt clear policies and his failure to properly train the Officer Defendants, were each a direct and proximate cause of the constitutional deprivation imposed upon Ms. Doe.

205. As a direct and proximate result of Defendants' unlawful actions, Ms. Doe endured and continues to endure pain, suffering, and irreparable harm.

Count IV

42 U.S.C. § 1983 - Violation of the Fourteenth Amendment: Deliberate Indifference to Medical Needs

(Against Sheriff Scotty Rhoden, Officer Defendants, and Dustin Williams)

206. Ms. Doe realleges and incorporates by reference the allegations of all the preceding paragraphs, and specifically paragraphs 6, 16, 19 to 23, 45, 50, 52, 67 to 72, 74 to 79, 81 to 101, 104 to 113, 117, 132 to 143, and 158 to 166, as if fully set forth herein.

207. Ms. Doe has a Fourteenth Amendment right to due process.

208. This includes a right against cruel and unusual punishment, which is violated when detention facility personnel display deliberate indifference to serious medical needs. *See Goebert v. Lee Cnty.*, 510 F.3d 1312, 1326 (11th Cir. 2007).

209. Ms. Doe's PTSD, depression, and anxiety qualify as objectively serious medical needs.

210. The Officer Defendants and Defendant Williams acted under color of state law when they showed deliberate indifference to her medical needs by denying her medically necessary and appropriate mental health care throughout her time at Baker, including in response to her obvious mental health emergencies.

211. The Officer Defendants' and Defendant Williams's display of deliberate indifference to Ms. Doe's serious medical needs was objectively unreasonable and violated her clearly established Fourteenth Amendment right to be free from cruel and unusual punishment.

212. Upon information and belief, the Officer Defendants and Defendant Williams acted pursuant to customs, policies, and procedures encouraged and perpetuated by Sheriff Scotty Rhoden.

213. As documented in the Statement of Facts section above, many individuals who have been detained at Baker have similarly reported medical abuse and medical neglect, demonstrating the culture and pattern of such abuse at Baker, that seemingly goes unreprimanded.

214. The policies and customs perpetuated by Sheriff Scotty Rhoden, as well as his failure to adopt clear policies and his failure to properly train the Officer Defendants and Defendant Williams, were each a direct and proximate cause of the constitutional deprivation imposed upon Ms. Doe.

215. As a direct and proximate result of Defendants' unlawful actions, Ms. Doe endured and continues to endure pain, suffering, and irreparable harm.

VI. REQUEST FOR RELIEF

Ms. Doe prays for judgment against Defendants as follows:

1. A declaratory judgment that Defendants' conduct complained of herein violated Ms. Doe's rights under the Constitution of the United States;
2. General and special damages for Ms. Doe from Defendants for the violations of her rights under federal law, including but not limited to pain, suffering, and emotional distress, to be determined according to proof;

3. Because no legal remedy will adequately compensate Ms. Doe for her injuries, an injunction barring Defendants from engaging in the unconstitutional customs and practices complained of herein and the order of a compliance monitoring scheme, overseen by this court or by an external monitor, given Baker's past inability to self-monitor and remedy such unlawful and ongoing practices;
4. An award of attorneys' fees under 42 U.S.C. § 1988;
5. Costs of suit;
6. Pre- and post-judgment interest as permitted by law; and
7. Such other and further relief as the Court may deem just and proper.

VII. DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Ms. Doe demands trial by jury in this action to all issues so triable.

Respectfully submitted,

Dated: July 16, 2025

AMERICAN CIVIL LIBERTIES
UNION OF FLORIDA

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** Motions to appear pro hac vice
forthcoming.*