



# MALDEF

The Latino Legal Voice for Civil Rights in America.

SENT VIA CERTIFIED U.S. MAIL

February 23, 2026

**National Headquarters**

MALDEF Nonprofit Center  
634 S. Spring Street, 12<sup>th</sup> Fl.  
Los Angeles, CA 90014  
TEL: 213.629.2512  
Fax: 213.629.0266

**Atlanta**

**Program Office**

34 Peachtree Street, NW  
Suite 2500  
Atlanta, GA 30303  
Tel: 678.559.1071  
Fax: 678.559.1079

**Chicago**

**Regional Office**

11 East Adams Street  
Suite 700  
Chicago, IL 60603  
TEL: 312.427.0701  
Fax: 312.427.0691

**Los Angeles**

**Regional Office**

634 S. Spring Street,  
11<sup>th</sup> Fl.  
Los Angeles, CA 90014  
TEL: 213.629.2512  
Fax: 213.629.0266

**Sacramento**

**Program Office**

1512 4<sup>th</sup> Street  
Sacramento, CA 95814  
Tel: 916.444.3031  
Fax: 916.444.7207

**San Antonio**

**Regional Office**

110 Broadway  
Suite 300  
San Antonio, TX 78205  
TEL: 210.224.5476  
Fax: 210.224.5382

**Washington, D.C.**

**Regional Office**

1016 16<sup>th</sup> Street, NW  
Suite 100  
Washington, DC 20036  
Tel: 202.293.2828

Executive Officer, Board of Supervisors  
Los Angeles County  
500 W. Temple Street, Room 383  
Los Angeles CA 90012

Andrea Turner  
Los Angeles County Health Services  
313 N. Figueroa St.  
Los Angeles CA 90012

Harbor-UCLA Medical Center  
1000 West Carson Street  
Torrance, CA 90502

**RE: Cover Letter and CTCA Claim of Bayron Rovidio Marin**

Dear Counsel,

The Mexican American Legal Defense and Educational Fund (MALDEF) represents Bayron Rovidio Marin (hereinafter Mr. Marin) in this claim against Harbor-UCLA Medical Center (hereinafter Harbor) and its operators for violating his rights as a patient and possibly facilitating the violation of his civil liberties by federal agents.<sup>1</sup> Harbor subjected Mr. Marin to discriminatory and unequal treatment while receiving medical care. We provide this notification and claim for damages for injury caused to Mr. Marin by Harbor staff in accordance with the California Tort Claims Act, Gov. Code, § 810 et seq. Please also find enclosed Mr. Marin’s completed standard form provided by the Los Angeles County Board of Supervisors on its website.

**Basis for Claim**

Harbor-UCLA Medical Center violated Mr. Marin’s right to privacy and other civil liberties while receiving medical treatment from August 27, 2025, until ICE departed his bedside on or around October 4, 2025. Mr. Marin was unlawfully detained by masked federal agents in unmarked cars, sustaining severe injuries to his knees and legs in the process. The agents initially withheld medical treatment from Mr. Marin, indicating that they believed he was lying and that in any case they did not care as they only cared about deporting him. Harbor allowed these agents to dictate the pace and parameters

---

<sup>1</sup> Brittny Mejia & Rachel Uranga, Federal Agents Held, Shackled a Seriously Injured Man to a Hospital Bed for 37 Days Without Explaining Why, L.A. Times (Oct. 7, 2025), <https://www.latimes.com/california/story/2025-10-07/federal-agents-held-shackled-a-seriously-injured-man-hospital-bed-37-days>.

of Mr. Marin's treatment to achieve that end and granted them unlimited access to him while receiving treatment.

Harbor staff admitted Mr. Marin on August 27, 2025, under a "blackout" procedure and registered under the pseudonym "Har Maine UNK Thirteen." Federal agents took Mr. Marin to the emergency room where he waited to receive an x-ray. Mr. Marin was concerned about having just been abducted from the street and then taken to the hospital without anybody knowing what had happened and asked staff in the x-ray department to notify his family about his condition. One of the staff, whom Marin believes to be either a nurse or doctor, wanted to contact Mr. Marin's emergency contact. Federal agents told the staff that they could not, and they acquiesced. Another doctor present appeared to be in total agreement with federal agents.

Mr. Marin was then taken up to a room where he was chained to a bed with tightly strapped handcuffs by his injured leg and wrist while the agent handcuffing him mocked him. Hospital administration staff arrived and spoke with the agents, apparently in secret from Mr. Marin. Mr. Marin identified a woman by the name of Laura Santana and another person, possibly by the name of "Jose." Mr. Marin heard them speaking to the agents in English about whether his family could come to see him. The federal agents told the staff that neither his family nor attorneys could see him, and staff agreed. Once the agents left Mr. Marin asked Laura in Spanish what they had spoken about. Laura told him that his family would be able to see him although he had just heard them tell the agents that his family would not be allowed to visit, apparently believing Mr. Marin did not speak English.

Mr. Marin thereafter received medical care while under the constant watch of federal agents, over his repeated objections to medical staff. Staff even allowed the agents to interrogate him about his immigration status while under medication and chained to his bed. There was an apparent disagreement among staff as to whether agents were permitted to stay in the room during treatment, such as while receiving medication. On one occasion nurses told agents that they had to leave the room while they administered his medication, but the agents refused and demanded to be present. The nurses did not give him the medication until later in the afternoon and while in the presence of agents. Throughout his stay, some agents would leave while others would refuse and stay. However, Harbor administration ratified the entirety of their conduct.

Harbor staff helped keep Mr. Marin isolated from both his family and counsel. His immigration attorney, Cynthia Santiago, later arrived to Harbor seeking to meet with her client but was denied access by Harbor's security guards at the direction of ICE and then eventually escorted from the premises by the Los Angeles Sheriff's Department. Mr. Marin's family eventually was admitted into the hospital and was able to see him briefly before being escorted from the room by the agents and then forced to leave because the hospital would not

allow them to remain in the hallway. Harbor staff helped immigration agents keep Mr. Marin isolated after he was unlawfully plucked from the streets and allowed agents the opportunity to interrogate him to his detriment while Mr. Marin was under medication. Harbor continued to medicate him in the presence of federal agents while also prohibiting him from seeing his immigration attorney.

Mr. Marin's treatment by Harbor was traumatic as he was made a bystander, chained to his bed, in his own treatment at the request of federal agents who had unlawfully abducted him in a sudden and violent raid, then shoved into an unmarked car. Harbor medicated Mr. Marin before interrogation, allowed them to be with him at all stages of treatment, took direction from agents, prevented his attorney from seeing him, and some staff even refused his request to speak with agents to ask them to loosen the cuffs on his wrist that prevented him from eating. Another male nurse, possibly of Filipino heritage, would periodically come to take his pressure and appear to laugh about his situation. On one occasion, he jokingly asked Mr. Marin if they were taking him to Guantanamo Bay, a place associated with the torture of its inmates. Mr. Marin received these comments as he noticed other members of his care team, including at least one doctor, develop a very apparent and friendly relationship with the agents.

Mr. Marin noted that some staff appeared more concerned with discharging him quickly despite his medical notes indicating that acute hospitalization was required as late as October 7, 2025. Upon discharge, Mr. Marin had been scheduled for a series of follow-up appointments with the x-ray department and attended the first one. However, Harbor called him and abruptly canceled all appointments without explanation. They merely told him they could not help him anymore and to not return. The callous treatment by Harbor made Mr. Marin's medical treatment and wellbeing completely secondary to federal agent's desire to have him discharged for deportation with expeditious secrecy. Mr. Marin suffers from continued psychological and emotional harm from various memories that he possesses from admission throughout his operation and treatment until he was discharged. Mr. Marin suffers from frequent nightmares and has persistent trouble sleeping. Sometimes he feels like he is suffocating or drowning over the events that he experienced at Harbor.

Harbor is liable for improperly exposing Mr. Marin's confidential medical information, violating his rights as patient, and facilitating the violation of his civil liberties by federal agents. *See generally Marin v. Noem*, No. 2:25-CV-09343-CV (SSCX), 2025 WL 3152261, at \*1 (C.D. Cal. Oct. 21, 2025). Harbor's complicity in allowing federal agents to dictate the pace and parameters of his medical treatment solely so that they could deport Mr. Marin without his family or attorney's knowledge may be indicative of broader

systematic issues that violate various clearly established state policies.<sup>2</sup> Mr. Marin accordingly makes this demand for monetary compensation.

Personal Injury:

Mr. Marin sustained damages from the improper disclosure of his sensitive medical information and emotional damage because of Harbor's acquiescence to federal immigration authorities with callous disregard for his wellbeing as a patient. He suffered further damage from the unlawfully discriminatory treatment he received at Harbor.

Witnesses:

While the exact identities of all staff that interacted with Mr. Marin are unknown to him, Harbor has all records necessary to identify witnesses and staff involved, including administrative officials present. Some of the witnesses known to Mr. Marin from his medical records include:

- Laura Santana
- April Dela Cruz
- Dr. Alexanian
- Alondra Uribe
- Dr. Sedgewick
- Dr. Park
- Daniel Marc Zinar
- Samuel Wayne Yu
- Landon Hariss Morikawa
- Antonio de Jesus Moreno
- Jason A. Davis
- Jamie Mich. Williams
- Maria Gray
- Dr. Caroline Dong

Amount of Claim:

Mr. Marin is pursuing this as an Unlimited civil matter and is owed damages in the amount of \$250,000.

---

<sup>2</sup> Eilís O'Neill, ICE Agents Often Ignore Safety and Privacy Practices for Detainee Patients, Tacoma Nurses Say, KUOW (Feb. 18, 2026), <https://www.kuow.org/stories/ice-agents-often-ignore-safety-and-privacy-practices-for-detainee-patients-tacoma-nurses-say>.

## CONCLUSION

Harbor's conduct while Mr. Marin was unlawfully detained constitutes an egregious violation of his rights as a patient and Californian. Harbor's acquiescence to immigration enforcement's demands without concern for Bayron's privacy while receiving medical treatment violates California law and may have even exceeded the bounds of permissible cooperation in accordance with California's "sanctuary law" and other policy judgments reflected in state law.

Mr. Marin suffered damages because Harbor's discriminatory conduct. For the foregoing reasons, we submit this claim under the CTCA for compensation in the amount of \$250,000.

If any additional information or clarification is required that will help expedite this request, I can be reached at [ecasas@maldef.org](mailto:ecasas@maldef.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Eduardo Casas". The signature is fluid and cursive, with the first name "Eduardo" written in a larger, more prominent script than the last name "Casas".

Eduardo Casas  
Staff Attorney | Western Regional Office  
Mexican American Legal Defense and Educational Fund  
634 S. Spring Street - 11th Floor  
Los Angeles, CA 90014  
(213) 629-2512