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Electronically FILED by
Superior Court of California,
County of Los Angeles
9/23/2026 4:04 PM
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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

BAYRON ROVIDIO MARIN,

Plaintiff,

v.

HARBOR-UCLA MEDICAL CENTER;
LOS ANGELES COUNTY DEPARTMENT
OF HEALTH SERVICES; THE COUNTY
OF LOS ANGELES; and DOES 1-5,

Defendants.

Case No: **26STCV30280**

UNLIMITED CIVIL CASE

**COMPLAINT FOR DAMAGES AND
DECLARATORY RELIEF:**

1. Confidentiality of Medical Information Act, Cal. Civ. Code § 56 *et seq.*
2. California Constitution, Art. I, § 1
3. California Constitution, Art. I, § 7
4. False Imprisonment

DEMAND FOR JURY TRIAL

1 Plaintiff Bayron Rovidio Marin, by and through his attorneys, alleges the following, based
2 upon information and belief, against Defendants Harbor-UCLA Medical Center (“Harbor”) and
3 its administrators, Los Angeles County (“County”) and the Los Angeles County Department of
4 Health Services (“DHS”), and Does 1-5 (collectively “County Defendants” or “Defendants”):

5 **INTRODUCTION**

6 1. Plaintiff is an immigrant worker who was detained during a raid by Customs and
7 Border Protection (“CBP”) officers and unidentified plainclothes federal agents in August, 2025.¹
8 He has lived in the United States for over 20 years and does not have a criminal record. This raid
9 was part of a broader aggressive push by the Trump administration to implement the largest mass
10 deportation campaign in United States history.²

11 2. Marin sustained severe injuries to his knees when he fell during the chaos of the
12 raid. The agents initially withheld treatment because they wanted to deport him quickly before
13 eventually acquiescing and taking him to Harbor for medical treatment. Despite California’s strong
14 public policy against the use of state resources to facilitate mass deportation, Harbor staff aided
15 immigration agents in their unlawful arrest and detention of Marin.

16 3. Harbor staff helped federal agents hide Marin from his family, thereby interfering
17 with his ability to make informed medical decisions in consultation with his next of kin before
18 surgery. Harbor medical staff also allowed immigration agents to set the pace and parameters of
19 Marin’s treatment while a nurse jokingly asked if they were taking him to Guantanamo Bay.³

21 ¹ *LA County Hospital Policy Expands Rights for ICE Detainees*, The LA Local (Apr. 23, 2026),
22 <https://thelocal.org/immigration/la-county-hospitals-ice-policy/>.

23 ² Carmen Sestin, *Trump Praised It Without Naming It: What Was 'Operation Wetback'?* NBC News
24 (Nov. 11, 2015, 2:54 PM), <https://www.nbcnews.com/news/latino/trump-praised-it-without-naming-it-what-was-operation-wetback-n461666>.

4. Defendants' actions and/or omissions violated the Confidentiality of Medical Information Act (CMIA) and the California Constitution, and constitute unlawful imprisonment. Defendants' violations have inflicted significant harm on Plaintiff, including compensatory damages for emotional distress.

JURISDICTION AND VENUE

5. Jurisdiction is proper in the Los Angeles County Superior Court because it has general subject matter jurisdiction and no statutory exceptions to jurisdiction exist.

6. Venue is proper in the County of Los Angeles under California Code of Civil Procedure § 393 because the alleged harm occurred in Torrance, California.

7. Plaintiff submitted a timely administrative claim in accordance with the California Tort Claims Act codified as Government Code §§ 810-996.6. Los Angeles County denied this administrative claim on March 24, 2026.

PARTIES

8. Plaintiff Bayron Rovidio Marin is a resident of Los Angeles, California. He is an immigrant and has lived in the United States for over 20 years, washing cars for a living.

9. Harbor-UCLA Medical Center is a public teaching hospital located at 1000 West Carson Street in West Carson, an unincorporated area within Los Angeles County, California. The hospital is owned by Los Angeles County.

10. Los Angeles County Department of Health Services (LADHS) is Los Angeles County's integrated public healthcare system. Its system includes four public hospitals, more than 20 community health centers, Emergency Medical Services, Correctional Health Services, and other community-based programs.

11. Los Angeles County is a municipal subdivision of the state charged with providing various public services, including operation of Harbor through LADHS.

12. The County and LADHS are vicariously liable for the injuries caused by Harbor.

13. Plaintiff is unaware of the true names and capacities of defendant Does 1 through

5. Plaintiff accordingly sues Does 1 through 5 by such fictitious names under Code of Civil Procedure § 474. Plaintiff will amend this complaint to allege the true names and capacities of Does 1 through 5 when Plaintiff discovers that information. Upon information and belief, each of them is responsible for and proximately caused the occurrences and damages that Plaintiff alleges in this Complaint.

FACTUAL ALLEGATIONS

14. On August 27, 2025, Marin was on his lunch break in his car when he heard shouting. He looked over and saw armed and masked individuals racing towards him. He later learned that these individuals were CBP and unidentified plainclothes federal agents executing an indiscriminate raid. He sustained severe injuries to his knees during the raid.

15. Agents shoved him into an unmarked vehicle and mocked him, telling him they did not care if he was injured because their priority was to deport him as quickly as possible. The agents took him to a staging area where they continued to downplay his injury and brought him a medic that attempted to relocate his knee. Marin's injury was so severe that these agents finally relented and took him to the emergency room at Harbor.

16. Marin was admitted under a “blackout” procedure for patients in law-enforcement custody and was registered under the pseudonym “Har Maine UNK Thirteen.” Federal agents remained at Marin's bedside during admission, transfer to non-public treatment areas, and throughout his stay, keeping him handcuffed to his hospital bed. Harbor and its agents permitted all of this to occur.

17. On or about August 27, 2025, CBP transferred custody of Marin to ICE. He

1 remained detained at Harbor-UCLA Medical Center under the supervision of ICE and its
2 contractor, Spectrum Detention Services (“Spectrum”). These uniformed guards were
3 continuously stationed in his hospital room, monitoring him at all times, including while he slept,
4 ate, used the restroom, or received medical care. Harbor and its agents permitted all of this to
5 occur.

6 18. Marin provided Harbor staff with an emergency contact and asked a nurse to let
7 his family know that he was okay. Another Harbor staff member intervened and told the nurse not
8 to contact anyone. ICE and Harbor and its agents subsequently denied Marin access to counsel and
9 isolated him from his family at Harbor. He was also subjected to questioning by government
10 officials about his place of birth, his family's immigration status, and other personal matters,
11 sometimes while he was in pain or under the influence of medication administered by Harbor staff.

12 19. His family eventually discovered his whereabouts through other sources, but ICE
13 continued to mislead the family about the severity of Marin’s injuries, describing his condition as
14 only a minor toe injury. Marin’s family contracted an immigration attorney who attempted to visit
15 Marin at Harbor. Both Harbor and ICE staff denied her access and she was eventually escorted
16 away by the Los Angeles County Sheriff’s Department.

17 20. Marin thereafter received medical treatment while under constant surveillance by
18 ICE contractors, as permitted by Harbor and its agents. Some doctors asked the agents to leave
19 the room during treatment while others allowed them to remain. Marin expressed discomfort with
20 their presence multiple times to Harbor staff, but his concerns were largely ignored. Marin
21 objected to their presence at least two or three times. The agents also appeared to maintain a
22 friendly rapport with certain hospital staff, including at least one doctor. Some staff members even
23 appeared sympathetic toward the agents. One nurse jokingly asked Marin if the agents were taking
24 him to Guantanamo Bay, a place associated with the extrajudicial torture of its prisoners.

21. The ICE agents allowed in his room interfered with his treatment. The agents were present at all hours and interfered with his ability to go to the bathroom in privacy, would turn the volume on the tv too loud for him to sleep, and some would refuse to let any sunlight in. One of these agents made a comment to others about how "it's great that Trump is doing this so Latinos don't do to the U.S. what Muslims and immigrants did to Europe." ICE agents would also frequently sift through his food with bare hands.

22. The agents followed Marin in non-public areas throughout his stay, as permitted by Harbor and its agents. ICE agents even attempted to enter his operating room until a doctor told them that they could not. They stood at the door to the operating room instead.

23. Hospital staff were complicit in this behavior. Marin continued to endure such treatment throughout October 4, 2025, when ICE finally departed his bedside. Eventually the federal court granted his habeas petition, and Marin has since been released.

24. Marin was to return for a follow-up appointment at Harbor that was scheduled by his care team. He was instead told that they would not see him anymore, canceled his appointment, and told him not to return.

CAUSES OF ACTION

FIRST CAUSE OF ACTION
Confidentiality of Medical Information Act
(Cal. Civ. Code § 56 *et seq.*)

25. Plaintiff realleges and incorporates by reference each and every allegation contained above as though fully set forth here.

26. The CMIA protects the confidentiality of patients' medical information by prohibiting health care providers from disclosing a patient's medical information without authorization. See Cal. Civ. Code § 56 *et seq.* The primary inquiry under the CMIA with regard to

1 breach of confidentiality is whether the information is exposed to a significant risk of unauthorized
2 access or use.

3 27. Plaintiff was a patient at Harbor from August 27, 2025 until his discharge in
4 October, 2025. As such, he was entitled to privacy over his medical information and treatment.

5 28. Upon information and belief, Harbor staff allowed ICE agents to be privy to
6 Marin's medical treatment and permitted them in non-public areas. At no point did Marin authorize
7 this disclosure and he expressed discomfort with their presence in the room while receiving
8 medical treatment to Harbor staff, but he was largely ignored.

9 29. Harbor's conduct violated the CMIA. Plaintiff is accordingly entitled to statutory
10 damages and actual damages for emotional distress stemming from the Hospital's facilitation of
11 ICE's conduct through unlawful disclosure.

12 30. Defendants maintained policies and or practices that violated Plaintiff's right to
13 privacy over his medical information, and Plaintiff sustained damages including, but not limited
14 to, emotional damages. The County and LADHS are vicariously liable for the unlawful conduct of
15 Harbor and its agents.

16 **SECOND CAUSE OF ACTION**
17 **Violation of the California Constitution**
18 **Cal. Const. art. I, § 1**

19 31. Plaintiff realleges and incorporates by reference each and every allegation
20 contained above as though fully set forth here.

21 32. The California Constitution guarantees to individuals the right of "privacy." This
22 right encompasses informational privacy interests and autonomy privacy interests such as
23 preserving the right to make intimate personal decisions and to conduct personal activities without
24 observation, intrusion, or interference.

1 33. Plaintiff had a cognizable and reasonable expectation of privacy over his medical
2 information and treatment. This includes limiting access to his room and other non-public areas
3 during his treatment. Plaintiff told Harbor staff that he was uncomfortable with the presence of
4 ICE and their agents in the room as nurses and physicians asked him sensitive medical information,
5 but his concerns were dismissed.

6 34. Harbor's breach is highly offensive to established norms and the trust patients place
7 in their attending medical team. California law recognizes the harm caused by unauthorized
8 disclosure of sensitive medical information, including the patient's state of mind, detailed
9 complaints of physical ills, and their emotional overtones.

10 35. Defendants maintained policies and or practices that violated Plaintiff's right to
11 privacy over his medical information, and Plaintiff sustained damages including, but not limited
12 to, emotional damages. The County and LADHS are vicariously liable for the unlawful conduct of
13 Harbor and its agents.

14 36. Plaintiff is entitled to declaratory judgment for Defendants' constitutional violation.

15 **THIRD CAUSE OF ACTION**
16 **Violation of the California Constitution**
 Cal. Const. art. I, § 7

17 37. Plaintiff realleges and incorporates by reference each and every allegation
18 contained above as though fully set forth here.

19 38. Article I, Section 7 of the California Constitution guarantees Californians equal
20 protection of the law. Classification based on race, nationality, alienage, or disparate treatment
21 affecting a fundamental interest or right triggers heightened scrutiny.

22 39. Harbor provided Plaintiff with unequal treatment as they refused to contact his
23 emergency contact prior to surgery and interfered with his right as a patient to set advance
24 healthcare directives. He was shackled despite being unable to walk since his injury. He appealed
25

1 to members of Harbor staff to speak with the agents about the cuffs because they were tight and
2 interfered with his ability to use the bathroom and to eat, but to his knowledge they did not do so.

3 40. Plaintiff expressed discomfort with the presence of unauthorized third parties in his
4 room during medical treatment, but he was ignored. Plaintiff also noticed that some staff were
5 apparently friendly or sympathetic towards ICE and its agents. Management staff appeared very
6 friendly with the agents. On one occasion, Plaintiff overheard staff speaking to the agents in his
7 room. The federal agents told Harbor staff that if family arrived to not let them in. Harbor staff
8 acquiesced immediately and told the agents to let them know if they needed anything. Harbor staff
9 spoke to agents in front of Marin in English, apparently believing that he did not speak the
10 language. Harbor staff told Marin in Spanish that his family was going to see him soon despite his
11 having heard them tell the agents the opposite in English.

12 41. A male nurse that would come periodically to check his vitals also jokingly asked
13 him if they were taking him to Guantanamo Bay and that he looked like a robot with his brace.
14 Guantanamo Bay is associated with the torture of its prisoners and has made the news in relation
15 to the Trump administration's efforts to send immigrants there for detention.

16 42. Upon information and belief, Defendants were aware that Plaintiff was an immigrant
17 and that he was held by immigration officials ostensibly because of his immigration status.
18 Defendants assumed the risk by deferring to immigration officials without proof or a judicial
19 warrant. Accordingly, Harbor staff endorsed ICE's classification of Marin, which was
20 subsequently held to be false.

21 43. Defendants maintained policies and or practices that provided care to a different
22 standard than other patients and violated Plaintiff's right to privacy over his medical information.
23 Plaintiff sustained damages including, but not limited to, emotional damages. The County and
24 LADHS are vicariously liable for the unlawful conduct of Harbor and its agents.

1 44. Plaintiff is entitled to declaratory judgment for Defendants' constitutional violation.

2 **FOURTH CAUSE OF ACTION**
3 **False Imprisonment**
4 **(California Tort Claims Act, Cal. Gov't Code §§ 815.2, 820)**

5 45. Plaintiff realleges and incorporates by reference each and every allegation contained
6 above as though fully set forth here.

7 46. The agents that arrested Marin did so unlawfully and did not present Harbor with
8 proof of a valid arrest because they did not have a warrant for him. The agents falsely arrested
9 Marin initially and continued to falsely imprison him at Harbor.

10 47. Harbor aided ICE in falsely imprisoning Marin by deferring to ICE and abiding
11 by their request to keep him hidden from family and counsel. Marin's medical staff would
12 periodically ask the agents if they had everything they needed while ignoring Marin's privacy
13 concerns and his desire to let his family know that he was alive. Marin was also handcuffed to his
14 hospital bed throughout his stay despite its interference with basic functions. Harbor staff ignored
15 his request to ask the agents to loosen the handcuffs because they were hurting him and interfered
16 with his ability to eat.

17 48. Defendants maintained policies and or practices that violated Plaintiff's rights
18 and he sustained damages including, but not limited to, emotional damages. Marin continues to
19 experience nightmares and anxiety from his stay at Harbor. The County and LADHS are
20 vicariously liable for Harbor's false imprisonment of Marin.

21 **JURY DEMAND**

22 49. Plaintiff demands a trial by jury

23 **PRAYER FOR RELIEF**

24 **WHEREFORE**, Plaintiff respectfully requests the following relief:

1. Declaratory judgment that Defendants' policies and practices set forth here are unlawful and violate:
 - a. The Confidentiality in Medical Information Act;
 - b. The right to privacy under Cal. Const. art. I, §1; and
 - c. The Equal Protections Clause under Cal. Const. art. I, § 7;
2. Statutory damages;
3. General damages, including compensatory damages according to proof;
4. Costs of the suit;
5. Reasonable attorneys' fees and expenses to the extent allowable by law;
6. Interest at the maximum legal rate for all sums awarded; and
7. For such other and further relief as this Courts deems just and proper.

Dated: September 23, 2026

Respectfully submitted,

**MEXICAN AMERICAN LEGAL DEFENSE AND
EDUCATIONAL FUND**



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