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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

J.C.R.D. and Y.L.H.A.,

Plaintiffs,

v.

HABERSHAM COUNTY, GEORGIA; SHERIFF ROBIN KROCKUM, in his official capacity; SERGEANT ADAM IVESTER, in his individual capacity and in his official capacity only for prospective relief; JOHN DOE U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT DEPORTATION OFFICER identified in local records as "ICE Agent Jeremy," full name presently unknown, in his individual capacity; JOHN DOE LAW-ENFORCEMENT PARTICIPANT identified in personal-device records as "D. Jon," full name, agency, title, role, and

Case No. _____

COMPLAINT FOR DAMAGES, DECLARATORY RELIEF, AND INJUNCTIVE RELIEF

capacity presently unknown; JOHN DOE LAW-ENFORCEMENT PARTICIPANT identified in personal-device records as "Maddox Corey," full name, agency, title, role, and capacity presently unknown; additional JOHN DOE U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT DEPORTATION OFFICERS; and additional JOHN DOE U.S. CUSTOMS AND BORDER PROTECTION BORDER PATROL AGENTS, in their individual capacities,

Defendants.

Plaintiffs Jose Carlos Rivas Diaz and Yanira Lizeth Hernández Andrade bring this civil action arising from a February 20, 2026 traffic stop in Habersham County that Plaintiffs allege became, or from its inception was intended to become, a coordinated state-federal immigration detention. Jose asserts federal constitutional and related Georgia-law claims against the state, local, and federal Defendants identified below. Yanira, Jose's wife, asserts her own Georgia-law claims for loss of consortium and intentional infliction of emotional distress arising from Defendants' alleged conduct and its direct effects on her and the marital relationship. Plaintiffs seek declaratory, injunctive, compensatory, nominal, and punitive relief where authorized by law, together with attorney's fees, expenses,

costs, interest, and such other relief as the Court deems just and proper. Plaintiffs allege as follows:

INTRODUCTION

1. This action arises from a February 20, 2026 roadside detention in Habersham County, Georgia. Plaintiff alleges that Sergeant Adam Ivester initiated a traffic stop without constitutionally sufficient justification, obtained and transmitted Plaintiff's identifying information to federal immigration personnel, and prolonged the detention while federal records checks were conducted. Plaintiff further alleges that federal officers arrived while the stop remained open, questioned him regarding identity, nationality, and immigration status, removed him from his vehicle, placed him in handcuffs, transported him, and assumed custody – all during what Defendant Adam Ivester characterized as a traffic stop. Contemporaneous local records reflect no traffic citation, state arrest, warrant, or criminal prosecution and reflect a final disposition of a verbal warning. Plaintiff alleges that a later incident report supplied materially different explanations for the stop and detention.

2. Plaintiff further alleges that the stop was not an isolated event. Contemporaneous recordings from the same evening reveal a recurring operational sequence involving repeated stops of construction work vans or

trucks, collection of identification documents, use of cellular communications on personal phones for law enforcement-related business, and the arrival of apparent federal personnel while local traffic stops remained ongoing. Recorded same-evening communications include a federal participant's explanation of a process whereby local officers stop motorists, forward identifying information to federal immigration personnel, and maintain the encounter until federal personnel arrive and assume responsibility. During a later recorded stop, Ivester described identification documents by nationality, discussed occupants' perceived immigration status and number, and participated in encounters during which masked personnel restrained or prepared occupants for transfer. Plaintiff alleges that these recurring features and statements support claims of selective enforcement based on actual or perceived ethnicity or national origin, coordinated local-federal immigration activity, and a policy, custom, failure to train or supervise, or ratification attributable to the proper local governmental defendant. Discovery is expected to further clarify the nature and scope of that activity.

3. Plaintiff seeks relief for the unlawful initial seizure, immigration-related prolongation, discriminatory treatment, joint participation in his arrest and custody transfer, interference with his person and property, and resulting physical, emotional, dignitary, familial, economic, and related injuries. The Complaint asserts federal constitutional claims under 42 U.S.C. § 1983, related Georgia tort claims under supplemental jurisdiction, and claims arising from federal officers' alleged personal participation only to the extent a legally available individual-capacity cause of action exists. Plaintiffs also

seek appropriate prospective relief, and Yanira seeks derivative loss-of-consortium damages to the extent established under Georgia law.

JURISDICTION AND VENUE

4. This action includes claims arising under the Fourth and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983. This Court has original jurisdiction over those federal claims pursuant to 28 U.S.C. §§ 1331 and 1343(a)(3)–(4).

5. This Court has supplemental jurisdiction under 28 U.S.C. § 1367(a) over Plaintiff's related Georgia-law claims, including false imprisonment and the Georgia-law tort claims pleaded herein, because those claims arise from the same traffic stop, detention, custody transfer, treatment, and resulting injuries and therefore form part of the same case or controversy under Article III.

6. This Court may grant declaratory relief under 28 U.S.C. §§ 2201 and 2202 and appropriate prospective equitable relief under the Constitution, 42 U.S.C. § 1983, and other applicable federal law. The Declaratory Judgment Act provides a remedy rather than an independent basis for subject-matter jurisdiction; jurisdiction rests on the federal claims identified above.

7. Venue is proper in the Northern District of Georgia under 28 U.S.C. § 1391(b)(2) because a substantial part of the events and omissions giving rise

to Plaintiff's claims occurred in this District. The local traffic stop, continued roadside detention, request for federal identity verification, federal response, coordinated enforcement activity, and transfer of custody occurred in or near Cornelia, Habersham County, Georgia.

8. Assignment to the Gainesville Division is proper because Habersham County lies within that Division and the principal events giving rise to Plaintiff's claims occurred there. Plaintiff does not invoke diversity jurisdiction.

PARTIES

9. Plaintiff Jose Carlos Rivas Diaz is a natural person who resides with his family in Georgia. Plaintiff works in residential construction and remodeling. On February 20, 2026, Plaintiff was driving his gray Nissan Frontier pickup truck southbound on Highway 365 in Habersham County when Defendant Sergeant Adam Ivester stopped him. Plaintiff was detained roadside, questioned concerning his identity, nationality, and immigration status, physically removed from his vehicle, handcuffed, transported, and held for immigration processing. Plaintiff brings this action for the resulting constitutional violations, loss of liberty, emotional and dignitary injuries,

disruption of his family and marital relationship, economic losses, property-related harm, and other damages alleged herein.

10. Plaintiff Yanira Lizeth Hernández Andrade is a natural person residing in Gainesville, Georgia, and is Jose Carlos Rivas Diaz's lawful wife. Yanira and Jose have shared a household since 2007 and were legally married in 2020, before the events alleged herein. They have three daughters residing in their household. Before Jose's detention, he was the household's primary financial provider and regularly provided Yanira companionship, affection, comfort, society, assistance, services, support, and shared family and household responsibilities. Yanira brings her own claims for loss of consortium and intentional infliction of emotional distress arising from Defendants' alleged conduct and the resulting disruption of her family and marital relationship. Ex. 13 (Yanira Declaration) ¶¶ 1–7, 11.

11. Defendant Sergeant Adam Ivester was, at all relevant times, a sergeant employed by the Habersham County Sheriff's Office and assigned to Unit 125. Ivester selected and stopped Plaintiff's vehicle, obtained and transmitted Plaintiff's identifying information, communicated with federal immigration personnel, maintained the roadside detention while immigration-related records checks were performed, and remained present when federal officers assumed custody of Plaintiff. Ivester is distinct from

Baldwin Police Officer Logan Ivester, who the presently available evidence indicates participated later by clearing Plaintiff's vehicle. Sergeant Adam Ivester acted under color of Georgia law and is sued in his individual capacity for damages and in his official capacity only to the extent necessary and legally permissible for prospective relief.

12. Defendant Habersham County, Georgia is named as a local governmental defendant to the extent discovery establishes that a county policy, practice, custom, funding decision, intergovernmental arrangement, or other county action contributed to the constitutional violations alleged herein. Defendant Robin Krockum is the elected Sheriff of Habersham County and the final policymaker for the Habersham County Sheriff's Office with respect to those matters for which Georgia law assigns responsibility to the Sheriff. Sheriff Krockum is sued in his official capacity solely for declaratory and prospective injunctive relief. Federal records state that immigration personnel were staged at a Sheriff's Office sub-office in Cornelia while conducting operations with deputies when a deputy requested assistance concerning Plaintiff. Plaintiff alleges that the challenged policies, customs, practices, training deficiencies, supervision failures, interagency coordination procedures, recordkeeping practices, and ratification theories alleged herein are attributable to the proper local governmental entity,

constitutional officer, or final policymaker as discovery may establish, to the extent that he was not acting as an arm of the state.

13. Defendants include a presently unidentified U.S. Immigration and Customs Enforcement Deportation Officer identified in local records only as "ICE Agent Jeremy," additional John Doe U.S. Immigration and Customs Enforcement Deportation Officers, and John Doe U.S. Customs and Border Protection Border Patrol Agents, whose full names, titles, and business addresses are presently unknown. Federal records state that Deportation Officers and Border Patrol Agents were staged at the Habersham County Sheriff's Office sub-office in Cornelia when a deputy requested identity verification concerning Plaintiff. Plaintiff alleges that these officers conducted records checks, responded to the roadside, questioned Plaintiff concerning his identity, nationality, alienage, and immigration status, opened Plaintiff's vehicle, physically removed and handcuffed him, transported him, and assumed federal custody. Plaintiff names these officers to preserve claims arising from their alleged personal participation only to the extent a legally available individual-capacity cause of action exists and will amend after discovery identifies them and clarifies their precise roles.

14. Defendants also include presently unidentified federal or other law-enforcement participants reflected in personal-device records under the

identifiers "D. Jon" and "Maddox Corey." The presently available screenshot depicts those identifiers in a message thread containing a photograph of Plaintiff's Maryland driver's license, a dropped location pin near U.S. 23-S in Cornelia, the question "Who's going to it," and the statement "He's coming w/us." Plaintiff does not presently know whether "D. Jon" and "Maddox Corey" are complete or accurate legal names, display names, contact labels, federal employees, state or local officers, or other operational participants; nor does the screenshot alone establish which participant sent or received each message. They are named provisionally to preserve claims only to the extent discovery establishes their identities, governmental affiliations, personal participation, and a legally available cause of action. Plaintiff will amend the Complaint after discovery clarifies those matters.

15. The identities of additional local officers, federal agents, supervisors, dispatchers, canine handlers, policymakers, and other participants who directed, approved, facilitated, joined, or failed to intervene in the challenged operation are presently unknown. The available evidence appears to identify Baldwin Police Officer Logan Ivester as an officer who cleared Plaintiff's vehicle and reflects participation by additional local and federal personnel during same-evening enforcement activity. Plaintiff is presently

unaware of the names and identities of these participants despite reasonable efforts to determine them before filing suit. Plaintiff will seek their identities, authority, communications, and precise roles through discovery and reserves the right to amend this Complaint to name proper additional defendants and assert claims supported by the evidence.

16. At all relevant times, Ivester and any additional state or local officers acted under color of state law, and the unidentified federal officers acted under color of federal authority. Plaintiff alleges that "ICE Agent Jeremy," the participants provisionally identified as "D. Jon" and "Maddox Corey," and the additional unidentified local and federal participants acted jointly or in concert to the extent established by discovery in obtaining and transmitting identifying information, extending the roadside detention, conducting immigration-related investigation, transferring custody, restraining Plaintiff, transporting him, and processing him. The present record does not establish whether "D. Jon" or "Maddox Corey" acted under color of state law, federal authority, or in another capacity. Personal participation, joint action, agency, scope of authority, and responsibility for the resulting injuries are alleged based on the presently available evidence and, where appropriate, in the alternative.

17. Plaintiff alleges, upon information and belief, that local and federal participants acted jointly, in concert, or pursuant to communications, requests, directions, understandings, or coordinated operational objectives that remain uniquely within Defendants' possession. Plaintiff further alleges, in the alternative, that certain actions attributed herein to local officers were undertaken at the request, direction, encouragement, or inducement of federal personnel, and that certain actions attributed herein to federal personnel were facilitated by local officers acting jointly with them. The precise allocation of responsibility among local and federal participants remains a proper subject of discovery.

FACTUAL AND PROCEDURAL HISTORY

A. The February 20, 2026 Traffic Stop

18. On February 20, 2026, Plaintiff Jose Carlos Rivas Diaz completed a day of construction and remodeling work in Habersham County, Georgia, and began driving home in his gray 2005 Nissan Frontier pickup truck, Georgia tag SGG8473. Plaintiff regularly used the truck for work. The truck was equipped with a metal rack supporting a ladder above the truck, and construction equipment was visible in its bed. The rack elevated the ladder above the bed and left additional space below for tools and equipment.

Plaintiff was the truck's sole occupant. Ex. 1 (Jose Declaration) ¶¶ 2, 5; Ex. 2 (Call for Service Detail Report) at 4–6; Ex. 3 (Incident Report) at 1; Ex. 6 (Dash-Camera Stills Compilation) at 57–60.

19. Plaintiff traveled southbound on Highway 365. Plaintiff states that he was obeying traffic laws and was unaware of any traffic violation. Plaintiff observed a patrol vehicle follow him for approximately one mile before activating its emergency lights. Ex. 1 ¶¶ 6–8.

20. The available dash-camera materials begin after Sergeant Adam Ivester was already traveling on Highway 365. The earliest produced frames depict a black passenger vehicle ahead of Ivester's patrol vehicle and Plaintiff's ladder-equipped work truck farther ahead in the same direction. Ivester passed the intervening vehicle and moved into position behind Plaintiff's work truck at approximately 6:29:53 p.m. The produced frames preceding the stop do not visibly depict Plaintiff's truck weaving, leaving its lane completely, or traversing the fog line such that his tire was not also on the fog line. The frames also depict the truck's exterior lights illuminated, its ladder secured on the elevated metal rack, and construction equipment in the bed. Ex. 6 (Dash-Camera Stills Compilation) at 57–59.

21. At approximately 6:30:18 p.m., Ivester activated his emergency lights. Plaintiff promptly moved onto the shoulder and stopped, using his right turn

signal as he completed the maneuver. Shortly after activating his emergency equipment, Ivester transmitted a request for a "28" inquiry and provided the truck's registration information. Habersham County E-911 created a call for service at 6:30:41 p.m., identifying Unit 125, Sergeant Ivester, the gray Nissan Frontier, and the location as Highway 365 and Kudzu Hill Drive in Cornelia, and classifying the encounter as a traffic stop. Ex. 1 ¶ 7; Ex. 2 at 4–6; Ex. 6 at 59–60.

22. Ivester approached the driver's side and requested Plaintiff's license. Plaintiff cooperated. Plaintiff states that Ivester attributed the stop to a problem with one of the truck's lights; Plaintiff does not recall being told that he crossed the fog line or failed to maintain his lane. At approximately 6:31:41 p.m., Ivester returned to his patrol vehicle with Plaintiff's information while Plaintiff remained detained at the roadside. Ex. 1 ¶¶ 6–10; Ex. 6 at 60–62.

B. The Request for Federal Identity Verification

23. At approximately 6:32 p.m., less than one minute after Ivester returned to his patrol vehicle, a Habersham County deputy asked federal immigration personnel to verify Plaintiff's identity. The federal Form I-213 states that Deportation Officers and Border Patrol Agents were then staged at a

Habersham County Sheriff's Office sub-office in Cornelia while conducting operations with deputies and began conducting records checks before traveling to the roadside. At 6:33:41 p.m., the CAD log recorded a unit check-in for Ivester's Unit 125; three seconds later, dispatch changed its status from "On Scene" to "Delay 10 Minutes." The CAD record does not identify who requested the status change or explain the reason for it. The request for federal identity verification occurred less than one minute after Ivester returned to his patrol vehicle with Plaintiff's identifying information. Ex. 2 at 5; Ex. 5 (Form I-213) at 2; Ex. 6 at 62.

24. On August 18, 2026, after multiple Open Records Act requests had been made concerning the stop, and on the same day the open records official at Habersham indicated in an email that no report existed, Ivester prepared an incident report concerning the February 20, 2026 stop. The post-hoc report states that Plaintiff appeared nervous, fumbled with his license, had shaking hands, and presented a Maryland license whose photograph did not appear to match him. Ivester reported that he suspected the license might be fraudulent and contacted "ICE Agent Jeremy" because federal agents had additional identification resources and databases. The contemporaneous CAD record contains no entry reflecting those observations, suspected document fraud, criminal impersonation, a false-identification investigation, a state charge, a

warrant, or a state arrest; the call remained classified as a traffic stop. Compare Ex. 2 at 4–6, with Ex. 3 at 1–2.

25. Screenshots produced from Ivester's personal cellular telephone depict a Maryland driver's license photographed inside a vehicle, a dropped location pin near U.S. 23-S in Cornelia, and messages asking, "Who's going to it" and stating, "He's coming w/us." The visible thread includes participant or contact identifiers displayed as "D. Jon" and "Maddox Corey." The screenshots show that identifying and location information appeared in a personal-device exchange and that participants discussed who would respond and whether a referenced individual would leave with them. Standing alone, they do not establish whether those identifiers are complete or accurate legal names, the participants' agencies or titles, which participant sent or received each message, the precise transmission time, the complete conversation, or the identity of the person described as "He." Ex. 7 at 1–2.

C. Federal Personnel Arrive While the Traffic Stop Remains Open

26. At approximately 6:37:15 p.m., a white passenger van identified in the dash-camera compilation as an apparent federal immigration vehicle arrived behind Ivester's patrol vehicle approximately five minutes and thirty-four seconds after Ivester returned to his patrol vehicle with Plaintiff's

identification. At approximately 6:37:51 p.m., a person identified in the compilation as an apparent federal immigration agent approached from the passenger side of Ivester's patrol vehicle; by approximately 6:38:38 p.m., multiple persons identified as apparent federal agents were visible near Plaintiff's truck. The present record does not independently establish the van's ownership, agency affiliation, occupants, or preceding communications. Ex. 6 at 62–65.

27. Federal personnel arrived while the locally initiated stop remained open and Plaintiff remained detained. The Form I-213 states that federal officers conducted a field interview to establish Plaintiff's identity, alienage, and removability. Plaintiff states that multiple agents approached, questioned him about his identity, nationality, and immigration status, opened the driver's door, physically removed him, and handcuffed him. Plaintiff states that he did not resist, flee, or act aggressively. Ivester remained on the scene until the federal agents had seized the Plaintiff. Ivester's later report states that federal agents assumed responsibility and took Plaintiff into custody and identifies a contacted federal participant only as "ICE Agent Jeremy." Personal-device records separately display the identifiers "D. Jon" and "Maddox Corey," but the present record does not establish whether either identifier corresponds to a roadside participant or which person performed

any particular act. Ex. 1 ¶¶ 10–17; Ex. 2 at 4–5; Ex. 3 at 2; Ex. 5 at 2; Ex. 6 at 63–65; Ex. 7 at 1–2.

28. At 6:41:18 p.m., dispatch cleared the traffic stop, entered the disposition "Verbal Warning," and returned Unit 125 to available status. The CAD record identifies no traffic citation, state arrest, or separate state criminal charge. The local incident report lists no person arrested by the Sheriff's Office and categorizes the matter as "Assisting Other Agency." Ex. 2 at 4–6; Ex. 3 at 1.

D. The Records Provide Different Accounts of the Basis for the Stop

29. The presently available sources provide different accounts of the initial stop. Plaintiff recalls being told that the stop involved a lighting problem and does not recall being told that he crossed the fog line. The E-911 and CAD records identify no specific traffic offense and document a verbal warning. The Form I-213 describes an identity-verification request during a traffic stop but does not identify the predicate offense. Ivester's August 18, 2026 report states that both right-side tires crossed the white line near Highway 365 and Level Grove Road. The contemporaneous CAD record locates the eventual stop at Highway 365 and Kudzu Hill Drive. The report also places Ivester's observations concerning nervousness and the license photograph

after the seizure began. The produced dash-camera frames do not visibly depict both right-side tires crossing the fog line completely. Instead, they depict the right-side tires contacting or riding along the line, with part of a tire briefly extending past it. At no point does the tire lose contact with the fog line according to Counsel's review of the video. Because the recording begins after Ivester was already following Plaintiff's vehicle, it does not show all observations that may have preceded the recorded sequence. Ex. 1 ¶¶ 6, 8–9; Ex. 2 at 4–6; Ex. 3 at 1–2; Ex. 5 at 2; Ex. 6 at 57–60.

E. No State Citation, Arrest, or Separate Criminal Case Is Documented

30. The contemporaneous records do not reflect a state criminal investigation independent of the traffic stop and federal identity-verification request. The CAD record contains no entry indicating suspicion of driving under the influence, contraband, a weapon, criminal impersonation, fraudulent identification, or any other Georgia offense, and it identifies no warrant or state arrest. Although Ivester's later report states that he suspected the license might be fraudulent, the report does not state that he arrested Plaintiff or initiated a Georgia prosecution arising from that suspicion. The Form I-213 describes multiple activities that extended the time of the stop: identity verification, immigration investigation, database checks, alienage,

removability, custody, and processing – none of which appear to relate to assistance with a pending Georgia criminal prosecution. The only documented local traffic disposition is a verbal warning, and the records identify no citation for lane usage, equipment, lighting, or any other traffic offense. Ex. 2 at 4–6; Ex. 3 at 2; Ex. 5 at 2–3. Indeed, no audio record or other artifact reviewed by Counsel corroborates that the verbal warning, which appears in the CAD report, was ever formally given at all.

F. Federal Custody, Transportation, and Processing

31. After federal agents assumed responsibility, they questioned Plaintiff regarding citizenship or lawful permanent residence and sought information concerning his identity, nationality, family, birthplace, and immigration status. Plaintiff states that he was transported from the roadside to another location where agents gathered and processed other detainees until the van was full and that he remained there for several hours, and that he was the first of the detainees that evening. The federal record states that Plaintiff was taken into ICE custody without incident, transported to the Atlanta Field Office, and processed through documents including a Notice to Appear, Notice of Rights and Request for Disposition, and Warrant for Arrest of

Alien. The federal record further states that Plaintiff had no criminal history. Ex. 1 ¶¶ 17–22, 43–45; Ex. 5 at 2–3.

G. Effects of the Detention on Plaintiff and His Family

32. Plaintiff was unable to return home after work and states that he immediately asked to call his wife but was not permitted to do so. His family did not know where he was and spent the night contacting emergency services, hospitals, law-enforcement agencies, and immigration authorities. When the family found Plaintiff's truck the following morning, it was away from the main highway with its doors unlocked, keys visible on the driver's seat, and work tools inside. Ex. 1 ¶¶ 5, 14–22; Ex. 12 ¶¶ 5–13.

33. Yanira expected Jose to return home from work on February 20, 2026. When he did not return and could not contact her, she did not know where he was and searched for him through emergency services, hospitals, law-enforcement agencies, and immigration authorities. The next morning, the family located his unattended truck away from the main highway with its doors unlocked, keys visible on the driver's seat, and work tools inside. Yanira alleges that Defendants' unexplained seizure and isolation of Jose, refusal to permit him to contact her, exposure of his vehicle and livelihood

tools, and ensuing detention foreseeably caused her severe fear, anguish, and distress. Ex. 12 ¶¶ 5–13; Ex. 13 ¶¶ 3–7, 11.

34. Plaintiff describes fear, continuing emotional trauma, and difficulty discussing the encounter. He states that he received no food or water for approximately four or five hours and refrained from requesting restroom access because he feared mistreatment. Plaintiff's spouse states that he earned approximately $5,000 per month through home-remodeling work and was the household's primary source of income. Because of his confinement in immigration detention before obtaining release on bond, Plaintiff lost a remodeling job with an anticipated gross contract value of approximately $5,000 and a separate remodeling job with an anticipated gross contract value of approximately $45,000. Plaintiff and his family also had to pay a $10,000 immigration bond to secure his release from detention. His spouse describes the detention as financially devastating. His absence also interrupted his responsibilities as a father, provider, church leader, and community volunteer. Ex. 1 ¶¶ 2–3, 46–53; Ex. 12 ¶¶ 13–15; Ex. 13 ¶¶ 3–7, 11.

H. Disruption of Plaintiff's Immigration Process and Continuing Release Conditions

35. Before the detention, Plaintiff had begun a lawful process to regularize his immigration status. Plaintiff's United States citizen wife had obtained approval of a Form I-130 petition filed on his behalf, and Plaintiff had retained counsel to pursue a Form I-601A provisional unlawful-presence waiver. Plaintiff alleges that this process provided a potential pathway to lawful permanent residence while minimizing separation from his United States citizen spouse and children.

36. Plaintiff alleges that his detention and placement into removal proceedings disrupted that process. Counsel was required to divert time and resources from preparing the Form I-601A waiver to addressing Plaintiff's detention, bond proceedings, release conditions, and defense in removal proceedings. Plaintiff further alleges that his placement into removal proceedings complicated, delayed, and increased the cost of pursuing the immigration strategy that was already underway.

37. Plaintiff alleges that, as a result of the detention and ensuing removal proceedings, the process of seeking lawful status became substantially more difficult, uncertain, expensive, and prolonged. Plaintiff and his family incurred additional legal fees and related expenses associated with detention,

bond proceedings, removal defense, compliance with release conditions, and efforts to preserve the underlying immigration strategy. Plaintiff alleges that these setbacks arose after he was placed into immigration custody through the coordinated roadside detention described above.

38. After Plaintiff's release, immigration authorities placed him on an electronic ankle monitor. Plaintiff alleges that the device restricts his movement and interferes with his remodeling work. He no longer drives or operates construction vehicles and now travels to work only as a passenger. His work nevertheless requires movement around job sites and the use of ladders, scaffolding, heavy tools, construction materials, and safety equipment. Plaintiff further alleges that he fears a device malfunction, loss of signal, false alert, or other perceived noncompliance could result in renewed detention. Plaintiff alleges that these conditions have impaired his ability to work, travel, support his family, and live without fear of being returned to custody. Ex. 1 (Declaration Regarding Release Conditions) ¶¶ 5–17.

I. Evidence of Local-Federal Communication and Coordination

39. The available records document communication between local officers and federal immigration personnel during Plaintiff's detention. Federal personnel were staged at a Sheriff's Office facility and conducting operations with

deputies when the identity-verification request was made. A local deputy supplied or caused Plaintiff's identifying information to be supplied; federal personnel began records checks before traveling to the roadside; and federal personnel arrived within minutes while the traffic stop remained open. Sergeant Adam Ivester remained present during their arrival and later reported that he transferred responsibility for Plaintiff after confirming that federal agents would assume custody. The presently available evidence further indicates that Baldwin Police Officer Logan Ivester, rather than Sergeant Adam Ivester, participated in clearing Plaintiff's vehicle. Ex. 1 ¶¶ 10–22; Ex. 2 at 4–5; Ex. 3 at 2; Ex. 5 at 2–3; Ex. 6 at 62–65.

40. Plaintiff requested preservation and production of records concerning the stop, the request for federal assistance, related enforcement activity, personal-device communications, and the transportation and transfer of detainees. On August 18, 2026, the records custodian initially advised that no responsive incident report existed and that Sergeant Adam Ivester would not return until later that week. An incident report later produced is dated August 18, 2026 and contains observations concerning a fog-line crossing, Plaintiff's demeanor, the Maryland license, and referral to federal personnel that do not appear in the contemporaneous CAD record. The Sheriff's Office also initially advised that it would attempt to obtain responsive information

from Sergeant Adam Ivester's personal cellular telephone but later stated that he would not surrender the device and that any additional information would need to be obtained by subpoena. After conferring with the county attorney, Ivester finally shared a screenshot from his personal phone. Plaintiff seeks native communications, metadata, extraction records, document-creation and modification data, and testimony concerning the creation of the report and related communications. Ex. 3 at 1–2; Ex. 4 at 1–6, 13–17.

J. Similar Stops and Recurring Operational Sequence

41. The dash-camera materials depict Plaintiff's stop and at least three additional stops by Sergeant Adam Ivester on February 20, 2026. The four vehicles consisted of two vans and two trucks. Three—including Plaintiff's truck—were equipped with ladders; the remaining vehicle was a truck with a large bed and wooden frame. All four shared characteristics consistent with work trucks or work vans used in construction work. One separate recording begins at approximately 6:46 p.m., shortly after Plaintiff's transfer; another begins at approximately 7:12 p.m.; and a later recording begins at approximately 7:51 p.m. In each, Sergeant Adam Ivester follows or positions his patrol vehicle behind a work vehicle and initiates a stop. The produced footage for the approximately 6:46 p.m. and 7:12 p.m. encounters does not

visibly depict a traffic violation before activation of the emergency lights. In the later encounter, the ladder-equipped van does not appear to touch the fog line until after the emergency lights are activated. Because the recordings do not necessarily capture every observation preceding the stops, they do not establish all facts known to Sergeant Adam Ivester at the moment of seizure. Ex. 6 at 2–8, 44–65.

42. The additional recordings depict a recurring sequence after the vehicles were stopped. Sergeant Adam Ivester requested or collected identification from drivers and occupants, carried identification back toward his patrol vehicle, and used or was near cellular telephones during the encounters. In the approximately 6:46 p.m. stop, a masked officer arrived about six minutes and thirty-nine seconds after Sergeant Adam Ivester returned to his patrol vehicle with identification. In the approximately 7:12 p.m. stop, a white passenger van identified in the produced materials as an apparent federal vehicle arrived about five minutes and fifty-four seconds after his documented return to the patrol vehicle. In Plaintiff's stop, the comparable interval was approximately five minutes and thirty-four seconds. The stills alone do not establish the arriving persons' identities or agencies, the recipients or contents of any communications, or whether each arrival resulted from advance coordination. Ex. 6 at 44–56, 62–65.

43. The approximately 7:51 p.m. recording depicts Sergeant Adam Ivester obtaining identification documents from occupants of a ladder-equipped work van before masked personnel arrived. After their arrival, he reported the number and location of occupants and described identification documents as Mexican or Guatemalan. He stated words to the effect of, "They are all admitting illegals," and discussed occupant totals with a masked officer. The recording also captures statements including, "This is probably it," followed shortly by the number "15," though neither statement's referent is established by the recording. No records reviewed by Counsel indicate that Sergeant Ivester is qualified to make immigration status determinations or take part in investigations or apprehensions of alleged undocumented immigrants. Officers later restrained occupants and transferred or prepared them for transfer. These statements and acts require authentication, complete-recording review, speaker identification, and discovery concerning any transport capacity, detention count, operational target, or immigration-enforcement objective. Ex. 6 at 8–25, 29–37.

44. The same later recording depicts Baldwin Police Officer and Adam Ivester's brother Logan Ivester, or an officer believed to be Logan Ivester based on the presently available materials, arriving and using a cellular telephone; multiple masked officers appearing; a white passenger van arriving;

occupants being counted by seating position; and restraints resembling plastic zip ties being prepared or applied. When two occupants fled, both local and federal personnel pursued them, and the response expanded to include officers and resources associated with the Baldwin Police Department, Alto Police, and other agencies. These materials distinguish Officer Logan Ivester's apparent role from Sergeant Adam Ivester's conduct and show multi-agency participation, but the stills do not independently establish every participant's identity, authority, communication, or reason for action. Ex. 6 at 11–43.

45. Considered together, the four stops involved two vans and two trucks, all sharing characteristics consistent with construction work vehicles. Three were ladder-equipped; the remaining truck had a large bed and wooden frame. All occupants of each recorded work van or work truck were Hispanic. All occupants except one lawful permanent resident were detained or taken into custody. The lawful permanent resident was the driver of the van in the recording that begins at approximately 7:12 p.m. During that encounter, Ivester did not volunteer a traffic basis when he first addressed the vehicle; only after an occupant asked why the van had been stopped did Ivester state that the reason was failure to maintain lane. The produced footage does not visibly depict a traffic violation before Ivester activated his

emergency lights. The lawful permanent resident was not detained and received only a verbal warning for the alleged failure to maintain lane. The comparison stops also share several observable features: selection of work vans and trucks occupied exclusively by Hispanic persons; collection of driver and occupant identification; officers' use of cellular telephones; arrival of apparent federal personnel or a white passenger van within several minutes; discussion of occupants' nationality, identity documents, or immigration status; counting of occupants; and, for every occupant other than the lawful permanent resident, detention or transfer. Plaintiff alleges that the sequence in the approximately 7:12 p.m. van stop—an asserted lane-maintenance rationale supplied only after inquiry, followed by the release of the lawful permanent resident while the other Hispanic occupants were detained—forms part of the same recurring pattern of using traffic stops of construction work vehicles to identify occupants for immigration enforcement. Plaintiff shall seek discovery of the historical stops in Habersham County to review stops of white people or other races driving work trucks or work vans to investigate disparate treatment of drivers or passengers of non-Hispanic vehicles The presently produced materials do not establish the complete universe of stops, lawful basis for each seizure, complete content of communications, existence of numerical targets, or

direction by a final policymaker. Plaintiff seeks CAD and radio records, full recordings, native device communications and metadata, stop datasets, federal custody and transport manifests, operational plans, training materials, 287(g) or task-force records, and supervisory communications to determine the scope and authorization of the activity. Ex. 6 at 2–65.

46. The produced 287(g) spreadsheet lists a Georgia Task Force Model agreement for the Alto Police Department in Banks County, signed November 6, 2025, but that spreadsheet does not list Habersham County, the Habersham County Sheriff's Office, the City of Baldwin, the Baldwin Police Department, or the Baldwin City Police Department as Georgia 287(g) participants. A separate Alto Police Department 287(g) Task Force Model MOA states that only Alto Police Department personnel who are nominated, trained, certified, and authorized by ICE may perform delegated immigration-officer functions under that MOA, and only under ICE direction and supervision. Ex. 9; Ex. 10 at 1–5.

47. Based on those records, Plaintiff alleges that no currently available 287(g) agreement, certification, training record, or written authorization connects Sergeant Adam Ivester, the Habersham County Sheriff's Office, Officer Logan Ivester, the Baldwin Police Department, the City of Baldwin, or any other identified local officer from Habersham or Baldwin to delegated civil-

immigration-enforcement authority on February 20, 2026. Plaintiff further alleges that no presently available records identify a source of delegated authority, certification, training, or supervision comparable to the Alto Police Department MOA for officers who may have participated in civil immigration functions that evening. Plaintiff seeks the complete 287(g) files, nomination records, training and certification records, ICE supervision records, task-force assignments, operational directives, and communications necessary to determine whether any local participant had lawful authority to perform or assist civil immigration enforcement that evening. Ex. 6 at 8–43; Ex. 9; Ex. 10 at 1–5.

K. Recorded Statement Describing the Operational Method

48. During the approximately 7:12 p.m. stop, a federal participant engaged in a recorded conversation with Sergeant Adam Ivester. The federal participant stated, in substance, that in ideal circumstances, local officers stop vehicles, transmit identifying information to federal immigration personnel, federal personnel respond after reviewing the information, and local officers then leave after federal personnel assume responsibility. Plaintiff alleges that the statement constitutes direct evidence describing a coordinated operational practice involving prolonged local traffic stops, transmission of identifying

information to federal agents, immigration screening, and transfer of custody. The statement's precise wording, speaker identity, context, and admissibility remain subject to authentication and review of the complete recording. Ex. 6 at 44–56.

49. Plaintiff alleges that the sequence described by the federal participant mirrors the sequence documented in Plaintiff's stop, including the transmission of Plaintiff's identifying information, the interval during which federal personnel conducted records checks, the arrival of federal personnel while the stop remained open, and the transfer of Plaintiff into federal custody. The recorded statement therefore corroborates the chronology reflected in Plaintiff's stop and the additional same-evening stops. Plaintiff alleges that local officers and federal personnel were not acting independently but were participating in a coordinated process in which local traffic stops generated immigration referrals and federal responses. Plaintiff further alleges that the statement supports the inference that this process was understood by both local and federal participants. The identities, communications, authorization, and full scope of the participating persons remain to be established.

L. Procedural History

50. The underlying events occurred on February 20, 2026. The Form I-213 narrative was created at 7:43 p.m. that evening and documented federal records checks, field interview, custody, transportation, and processing. The contemporaneous local records classified the encounter as a traffic stop and closed it at 6:41:18 p.m. with a verbal-warning disposition. On August 18, 2026, the records custodian advised that no incident report existed and that Sergeant Adam Ivester would not return until Friday evening; the incident report later produced is dated that same day and describes a fog-line crossing, roadside observations, concerns about the Maryland license, and referral to federal personnel. Ex. 2 at 4–6; Ex. 3 at 1–2; Ex. 4 at 1–17; Ex. 5 at 2–3.

51. Plaintiff thereafter sought preservation and production of local and federal records concerning the stop, identity-verification request, federal involvement, related enforcement activity, personal-device communications, and transport and processing of detainees. Materials produced to date include declarations, CAD and E-911 records, a local incident report, the Form I-213, dash-camera recordings and stills, and personal-cell screenshots. Discovery concerning complete communications, metadata,

record checks, operational planning, and supervisory involvement remains material to the differing accounts of the encounter. Ex. 4 at 1–17.

52. Plaintiff remains in active removal proceedings arising from the detention described herein. A contested hearing is scheduled for September 21, 2026. Plaintiff continues to challenge the consequences of the detention in those proceedings, which remain pending.

CLAIMS FOR RELIEF

COUNT I

Unreasonable Seizure in Violation of the Fourth Amendment

42 U.S.C. § 1983

Against Defendant Adam Ivester

53. Plaintiff incorporates all preceding paragraphs.

54. At all times relevant to this Count, Defendant Adam Ivester acted under color of Georgia law while performing duties as a sergeant with the Habersham County Sheriff's Office. Plaintiff alleges that Ivester exercised official law-enforcement authority while operating a patrol vehicle, activating emergency equipment, conducting a traffic stop, detaining Plaintiff, and obtaining Plaintiff's identifying information.

55. A traffic stop constitutes a seizure within the meaning of the Fourth Amendment. On February 20, 2026, Ivester activated his emergency lights and caused Plaintiff to stop on the shoulder of Highway 365. Plaintiff submitted to that show of authority and was not free to leave.

56. Plaintiff alleges that no facts known to Ivester at the inception of the stop provided an objectively sufficient basis for the seizure. Plaintiff alleges that he was operating his vehicle lawfully, was unaware of any traffic violation, and was not contemporaneously advised that he had crossed a fog line or failed to maintain his lane. Plaintiff further alleges that the contemporaneous CAD and E-911 records identify no specific traffic violation and that the stop concluded with a verbal warning.

57. Plaintiff further alleges that the produced dash-camera materials do not visibly depict the traffic violation later asserted by Ivester. Although a report prepared approximately six months after the stop asserts that Plaintiff crossed the white line and failed to maintain his lane, Plaintiff alleges that the later report conflicts with contemporaneous records and with the explanation Plaintiff recalls receiving during the stop. Plaintiff further alleges that the later report identifies a location different from the location reflected in the CAD records.

58. Plaintiff alleges that Ivester selected Plaintiff's vehicle, positioned his patrol vehicle behind Plaintiff, activated emergency lights, initiated the seizure, approached the vehicle, requested identification, and maintained control of the stop. These actions were personally performed, directed, participated in, facilitated, or caused by Ivester and directly resulted in the seizure challenged herein. Plaintiff further alleges, in the alternative and upon information and belief, that Ivester acted pursuant to communications, requests, coordination, encouragement, inducement, or direction originating from federal personnel whose identities and roles remain the subject of discovery.

59. As a direct and proximate result of the unlawful seizure, Plaintiff was detained roadside, deprived of liberty, subjected to further investigation, exposed to additional law-enforcement action, and suffered emotional, economic, and other consequential injuries and damages. Plaintiff alleges that the seizure was a direct and proximate cause of the injuries described in this Complaint.

60. By initiating a traffic stop without an objectively sufficient legal basis, Defendant Ivester violated Plaintiff's rights under the Fourth Amendment and 42 U.S.C. § 1983.

61. WHEREFORE, Plaintiff requests judgment against Defendant Ivester for compensatory damages, nominal damages, punitive damages to the extent permitted by law, attorney's fees and costs pursuant to 42 U.S.C. § 1988, and such further relief as the Court deems just and proper.

COUNT II

Unreasonable Prolonged Detention in Violation of the Fourth Amendment

42 U.S.C. § 1983

Against Defendant Adam Ivester

62. Plaintiff incorporates by reference all preceding paragraphs as though fully set forth herein.

63. At all times relevant to this Count, Defendant Adam Ivester acted under color of state law while performing duties as a sergeant with the Habersham County Sheriff's Office. Plaintiff alleges that Ivester exercised official authority throughout the duration of the traffic stop and subsequent detention.

64. Plaintiff alleges that, after the traffic-related purpose of the stop had been completed or reasonably should have been completed, Ivester continued to detain Plaintiff while identity-verification requests, immigration-related records checks, communications with federal personnel, and related

activities were undertaken. Plaintiff alleges that the detention was extended beyond the time reasonably necessary to complete any traffic-related mission.

65. Plaintiff alleges that the stop concluded with a verbal warning and no traffic citation. Plaintiff further alleges that no state arrest, warrant, or Georgia criminal charge arising from the purported traffic violation was issued.

66. Plaintiff alleges that, during the continued detention, Ivester investigated matters unrelated to the traffic-related purpose of the stop, reviewed and transmitted identifying information, communicated with other agencies, and participated in actions that extended the seizure beyond the time reasonably necessary to complete the traffic-related mission of the stop.

67. Plaintiff further alleges that the continued detention, even if found to have commenced lawfully, was used to facilitate immigration-related inquiry, investigation, referral, communication, transfer, or custody actions unrelated to any traffic-related purpose of the stop. Plaintiff alleges that the objective circumstances known to Ivester did not provide an independent lawful basis sufficient to justify the continued detention.

68. Plaintiff alleges that the detention was prolonged for the purpose of permitting federal immigration personnel to investigate Plaintiff's identity,

nationality, alienage, or immigration status and to assume custody while the traffic stop remained open.

69. Plaintiff further alleges that a recorded federal-participant statement describing the practice of having local officers stop motorists, transmit identification information, and await federal response supports the inference that Plaintiff's detention was intentionally maintained to facilitate immigration screening and federal assumption of custody rather than solely to complete a traffic-related mission.

70. The actions giving rise to this Count were personally performed, directed, participated in, facilitated, or caused by Ivester. Plaintiff alleges that Ivester exercised authority over the duration of the stop, controlled Plaintiff's continued detention, obtained and transmitted identifying information, and participated in the actions that extended the seizure beyond its traffic-related purpose. Plaintiff further alleges, in the alternative and upon information and belief, that Ivester acted pursuant to communications, requests, coordination, encouragement, inducement, or direction originating from federal personnel whose identities and roles remain the subject of discovery.

71. As a direct and proximate result of the prolonged detention, Plaintiff suffered a continued deprivation of liberty, additional investigatory intrusion,

exposure to further law-enforcement action, emotional distress, economic damages, and other consequential injuries.

72. Plaintiff further alleges that the initial seizure described in Count I was unlawful from its inception and therefore could not furnish lawful authority for any continued detention. Plaintiff alleges that, even assuming arguendo that the initial stop was lawful, the continued detention described herein was independently unlawful because it was extended beyond the time reasonably necessary to complete any traffic-related mission and to facilitate immigration-related investigation and custody transfer.

73. By continuing to detain Plaintiff after the stop's traffic-related mission had been completed or reasonably should have been completed, by extending the detention to facilitate immigration-related investigation and custody transfer, and by continuing the detention without an independent lawful basis, Defendant Adam Ivester violated Plaintiff's rights under the Fourth Amendment and 42 U.S.C. § 1983. Plaintiff further alleges that any continuing detention was unlawful for the additional reason that the initial seizure was unsupported by a constitutionally sufficient basis.

74. WHEREFORE, Plaintiff demands judgment against Defendant Adam Ivester for compensatory damages, nominal damages, punitive damages to the

extent permitted by law, attorney's fees and costs pursuant to 42 U.S.C. § 1988, and such other and further relief as the Court deems just and proper.

COUNT III

Equal Protection

42 U.S.C. § 1983

(Against Defendant Adam Ivester and Additional Individual State or Local Defendants Identified Through Discovery)

Plaintiff incorporates all preceding paragraphs as though fully set forth herein.

75. Defendants intentionally treated Plaintiff differently than similarly situated persons. Plaintiff alleges that actual or perceived ethnicity, national origin, alienage-related assumptions, or perceived immigration status were substantial or motivating factors in Defendants' actions.

76. Plaintiff alleges that the same-evening recordings depict Sergeant Ivester repeatedly selecting construction work vans or trucks, collecting identification from drivers and occupants, using or remaining near cellular telephones, and maintaining the encounters until apparent federal personnel or a white passenger van arrived. All persons detained or taken into custody during the recorded same-evening stops were Hispanic. The only occupant

not detained was a lawful permanent resident, who received a verbal warning after the approximately 7:12 p.m. van stop.

77. During the later ladder-van stop, Ivester described identification documents as Mexican or Guatemalan, stated words to the effect of, "They are all admitting illegals," discussed occupant totals, and remained involved while masked personnel restrained or prepared occupants for transfer.

78. Plaintiff alleges that these facts support the inference that perceived ethnicity, national origin, alienage-related assumptions, or perceived immigration status were substantial or motivating factors in selecting Plaintiff for seizure, investigation, detention, and referral.

79. Plaintiff alleges that Defendants used perceived Latin American national origin, foreign identification documents, construction work vehicles, and other characteristics associated with immigrant laborers as proxies for suspected unlawful immigration status. The approximately 7:51 p.m. recording depicts Ivester identifying documents as Mexican or Guatemalan and characterizing occupants as "illegals" before restraints and transfer activity. Plaintiff's stop followed the same alleged sequence of work-vehicle selection, collection and transmission of identification, immigration records checks, rapid federal response, questioning about identity, nationality, and immigration status, and transfer into federal custody.

80. Plaintiff alleges that the discriminatory treatment was carried out jointly by local and federal participants and that discovery will determine the extent to which local participants acted independently or at the request, encouragement, inducement, coordination, or direction of federal personnel.

81. Plaintiff alleges that the protections of the Equal Protection Clause apply regardless of citizenship or immigration status and that Defendants lacked a lawful basis to treat Plaintiff differently because of actual or perceived ethnicity, national origin, alienage-related assumptions, or perceived immigration status.

82. Defendants' intentional discriminatory treatment directly and proximately caused Plaintiff's seizure, detention, referral for immigration investigation, transfer into federal custody, and the resulting injuries and damages described in this Complaint.

COUNT IV

Municipal and Policymaker Liability Based on Policy, Custom, Failure to Train, Failure to Supervise, and Ratification

42 U.S.C. § 1983

(Against the Proper Local Governmental Entity and/or Final Policymaker as Discovery May Establish)

Plaintiff incorporates all preceding paragraphs as though fully set forth herein.

83. Plaintiff's constitutional injuries were caused by a coordinated local-federal enforcement practice involving roadside vehicle selection, collection and transmission of identifying information, detention while immigration checks were performed, rapid response by federal personnel, and transfer of occupants for immigration processing. Plaintiff further alleges that federal immigration personnel were already staged with local deputies at a Sheriff's Office facility when Plaintiff's identifying information was transmitted and federal records checks began. The produced 287(g) spreadsheet does not list Habersham County, the Habersham County Sheriff's Office, the City of Baldwin, the Baldwin Police Department, or the Baldwin City Police Department as Georgia 287(g) participants, while the separate Alto Police Department MOA limits delegated immigration authority to Alto personnel who are nominated, trained, certified, and authorized by ICE. Plaintiff alleges that the absence of any currently available Habersham or Baldwin 287(g) authorization, training, or certification supports the need for discovery into whether local officers lacked lawful authority, training, supervision, and policies for the civil immigration functions performed or assisted that evening.

84. Plaintiff alleges that the same-evening stop of Plaintiff and the additional recorded stops involving work vehicles exhibited recurring characteristics,

including collection of driver and occupant identification, use of cellular telephones, immigration-related communications, arrival of apparent federal personnel or a white passenger van within minutes, discussion of immigration-related matters, and restraint or transfer of occupants. Plaintiff further alleges that these recurring features support an inference of a coordinated practice rather than isolated conduct.

85. The recorded statement describing the method by which local officers conduct traffic stops, send identifying information to federal personnel, and await federal response supports the inference that the recurring sequence reflected in the same-evening recordings was an established operational practice rather than a series of unrelated discretionary decisions. Plaintiff alleges that the statement is evidence of an understood procedure known to both local and federal participants. That coordinated referral-and-response method was a moving force behind Plaintiff's seizure, continued detention, immigration investigation, and transfer because the challenged detention and resulting custody transfer occurred through implementation of that method.

86. Plaintiff further alleges, upon information and belief, that certain local actions were undertaken pursuant to federal requests, operational directives, communication protocols, referral procedures, standing practices, coordinated enforcement objectives, or other forms of federal direction or

influence. The precise allocation of decision-making authority remains uniquely within Defendants' possession and is a proper subject of discovery.

87. Plaintiff alleges that the risk of constitutional violations arising from local participation in immigration-related enforcement activities was known or obvious because local officers allegedly collected identifying information, communicated with federal immigration personnel, assisted immigration-related investigations, or participated in transfers of detainees despite the absence of any presently identified 287(g) authorization, certification, training, or supervision applicable to the involved agencies. Plaintiff further alleges that available evidence supports an inference that the conduct extended beyond an isolated roadside encounter, and discovery will identify the extent of notice and policymaker knowledge, including complaints, reports, supervisory communications, operational directives, training materials, and related evidence.

88. Plaintiff alleges, in the alternative, that the proper local governmental entity or final policymaker maintained a custom or practice of permitting coordinated local-federal immigration-related activity without adequate policies, training, supervision, direction, documentation, or review. Plaintiff alleges that the absence of those safeguards reflected deliberate indifference to the known or obvious risk that local officers would conduct or assist

seizures, prolonged detentions, discriminatory enforcement, immigration-related referrals, and custody transfers without constitutionally sufficient authority.

89. Plaintiff further alleges, in the alternative, that the proper local governmental entity or final policymaker maintained an express policy, informal practice, recurring custom, failure-to-train regime, failure-to-supervise regime, ratification practice, or combination thereof that caused the constitutional violations alleged herein. Plaintiff pleads these theories in the alternative because the relevant policies, communications, training materials, operational directives, supervisory approvals, and policymaker decisions remain uniquely within Defendants' possession.

90. Plaintiff further alleges that final policymakers ratified, approved, tolerated, or failed to meaningfully investigate the conduct described herein after learning of it. Plaintiff alleges that discovery concerning supervisory review, report approval, records retention, training, policy directives, and disciplinary decisions is necessary to determine the extent of such ratification.

91. Plaintiff alleges that the lack of adequate policies, training, supervision, direction, or review concerning immigration-related enforcement activities

was a moving force behind the unlawful seizure, prolonged detention, discriminatory enforcement, referral, and transfer alleged herein.

92. Plaintiff pleads in the alternative municipal-liability theories based on policy, custom, failure to train, failure to supervise, failure to direct or review, deliberate indifference, and ratification. This Count does not rely on respondeat superior. Plaintiff seeks compensatory and nominal damages where authorized by law, declaratory relief, appropriate prospective injunctive relief, attorney's fees and costs under 42 U.S.C. § 1988, and such other relief as the Court deems just and proper.

COUNT IV-A

Procedural Due Process—Fundamental Fairness in the Initiation and Conduct of Removal Proceedings

Fifth and Fourteenth Amendments

(Against the Individual Federal Defendants and Defendant Adam Ivester, to the Extent a Legally Available Cause of Action Exists)

93. Plaintiff incorporates by reference all preceding paragraphs as though fully set forth herein.

94. The Due Process Clauses require that proceedings used to deprive a person of liberty be fundamentally fair. Plaintiff alleges that fundamental fairness

does not permit government officials to obtain procedural or evidentiary advantage in removal proceedings by deliberately inducing, coordinating, or exploiting an unlawful exercise of state or local police power.

95. Plaintiff alleges that federal immigration personnel encouraged, induced, coordinated, requested, or knowingly exploited a method under which local officers initiated or prolonged traffic stops, transmitted identifying information, and maintained motorists in custody while federal personnel conducted immigration screening and arrived to assume custody. Plaintiff alleges that the local participants lacked delegated civil-immigration-enforcement authority and used the coercive powers of criminal law enforcement to generate immigration referrals and custody transfers.

96. Plaintiff alleges that this method was applied to him through an initial seizure unsupported by a constitutionally sufficient traffic basis, or, alternatively, through the prolongation of any otherwise lawful traffic stop beyond its traffic-related mission. The resulting detention produced or facilitated the acquisition of Plaintiff's identity, alienage-related information, statements, Form I-213, Notice to Appear, custody, and placement into removal proceedings.

97. Plaintiff's removal proceedings are civil proceedings in which criminal-procedure protections do not apply in the same manner, and Plaintiff bears

burdens relating to suppression, relief, and other contested matters. Plaintiff alleges that Defendants' use of an unlawful criminal-law-enforcement seizure to create or materially strengthen the civil immigration case imposed procedural and evidentiary disadvantages that would not have arisen absent the challenged conduct.

98. Plaintiff alleges that government officials may not manufacture those disadvantages through deceptive, unlawful, or coordinated conduct and then invoke the civil character of removal proceedings to retain the resulting procedural benefit. The alleged arrangement permitted federal personnel to obtain the benefit of state and local police authority while shifting to Plaintiff the burden, expense, and risk of contesting the consequences in a forum where exclusionary protections are materially narrower than in a criminal prosecution.

99. The recorded federal-participant statement describing an ideal sequence in which local officers stop vehicles, transmit identifying information, await federal review and response, and leave after federal personnel assume responsibility supports the inference that the challenged process was deliberate and understood rather than accidental or isolated.

100. As a direct and proximate result, Plaintiff was placed into removal proceedings, detained, required to post a $10,000 immigration bond,

subjected to electronic monitoring and continuing release conditions, forced to divert legal resources from his pending family-based immigration process, and required to bear additional burdens, expense, uncertainty, and prejudice in contesting the use and consequences of information obtained through the challenged seizure.

101. This Count does not ask this Court to adjudicate removability, suppress evidence in the pending removal proceeding, terminate that proceeding, or review any final order of removal. Plaintiff instead seeks relief for Defendants' alleged personal participation in conduct that deprived him of liberty and subjected him to fundamentally unfair governmental process, only to the extent such relief is within this Court's jurisdiction and a legally available cause of action exists.

102. WHEREFORE, Plaintiff requests compensatory and nominal damages against the individual Defendants where legally authorized, declaratory and prospective relief within this Court's jurisdiction, reasonable attorney's fees and costs where recoverable, and such other relief as the Court deems just and proper.

COUNT V

Georgia False Imprisonment

Supplemental Jurisdiction

Against Defendant Adam Ivester

103. Plaintiff incorporates by reference all preceding paragraphs as though fully set forth herein.

104. Under O.C.G.A. § 51-7-20, false imprisonment is the unlawful detention of another person, for any length of time, whereby that person is deprived of personal liberty.

105. Defendant Adam Ivester detained Plaintiff by activating emergency equipment, causing Plaintiff to stop, retaining and transmitting Plaintiff's identifying information, controlling the roadside encounter, and keeping Plaintiff subject to official authority until federal immigration officers arrived and assumed custody.

106. Plaintiff alleges that the detention was unlawful. The contemporaneous CAD and E-911 records identify no specific traffic offense, citation, warrant, state arrest, or independent state criminal charge, and the stop concluded with only a verbal warning.

107. Plaintiff further alleges that Ivester continued the detention after the traffic-related purpose had been completed or reasonably should have been

completed so that federal officers could investigate Plaintiff's identity, nationality, and immigration status and take Plaintiff into federal custody. Ivester personally obtained and transmitted identifying information, communicated with federal personnel, maintained control of the open stop while federal records checks were performed, and remained at the scene during the transfer of custody.

108. Plaintiff further alleges that the recorded federal-participant statement describing a process in which local officers stop motorists, transmit identifying information to federal immigration personnel, and await federal response corroborates the inference that Ivester intentionally maintained Plaintiff's detention to facilitate immigration screening and federal assumption of custody rather than merely completing a traffic-related encounter.

109. Ivester's conduct was not an innocent mistake or merely negligent exercise of discretion. Plaintiff alleges that Ivester deliberately used his official authority and a traffic detention to hold Plaintiff for an unrelated immigration inquiry despite the absence of any contemporaneously documented state-law basis for continued restraint. The produced dash-camera materials do not visibly depict the fog-line crossing later asserted in an incident report prepared approximately six months after the stop. The

same-evening recordings depict Ivester repeatedly stopping construction work vehicles, collecting occupants' identification, communicating by cellular telephone, and keeping encounters open until apparent federal personnel arrived. During a later stop, Ivester described identification documents as Mexican or Guatemalan and stated words to the effect of, "They are all admitting illegals," before occupants were restrained or prepared for transfer. These facts support a reasonable inference that Ivester intentionally detained Plaintiff and intentionally continued the detention beyond any lawful traffic-related purpose. Plaintiff further alleges that Ivester acted with actual malice and an actual intent to cause the wrongful confinement alleged herein, sufficient to defeat official immunity.

110. As a direct and proximate result of Ivester's unlawful detention, Plaintiff lost his liberty, remained confined roadside, was subjected to additional investigation and immigration-enforcement action, was transferred into federal custody, and suffered emotional distress, lost income, familial disruption, and other consequential damages described in this Complaint.

111. WHEREFORE, Plaintiff demands judgment against Defendant Adam Ivester for compensatory damages, punitive damages to the extent permitted

by Georgia law, costs, and such other and further relief as the Court deems just and proper.

COUNT VI

Additional Georgia Torts

Supplemental Jurisdiction

(Pled in the Alternative and Only to the Extent Supported by the Evidence)

COUNT VI-A

Assault and Battery

112. Plaintiff incorporates by reference all preceding paragraphs as though fully set forth herein.

113. The presently unidentified federal officers—including "ICE Agent Jeremy" and, only if discovery establishes their federal status and personal participation, the participants provisionally identified as "D. Jon" and "Maddox Corey"—intentionally placed Plaintiff in reasonable apprehension of immediate harmful or offensive contact through assertions of custody, opening the driver's door, surrounding the vehicle, physically removing Plaintiff, and applying handcuffs. The precise officer or officers responsible for each act remain to be identified through discovery.

114. Those presently unidentified officers—including "ICE Agent Jeremy" and, only if discovery establishes their federal status and personal participation, the participants provisionally identified as "D. Jon" and "Maddox Corey"—intentionally made unauthorized and offensive physical contact with Plaintiff by physically removing him from his truck, restraining and handcuffing him, searching or controlling his person, and transporting him. The precise allocation of these acts among the participating officers remains within Defendants' possession and is a proper subject of discovery.

115. Plaintiff did not resist, flee, or act aggressively. Any force or physical contact used to accomplish an arrest or detention unsupported by lawful authority was unprivileged and unlawful.

116. As a direct and proximate result, Plaintiff suffered physical discomfort, emotional distress, humiliation, pain and suffering, and other compensable damages.

COUNT VI-B

Trespass to Personalty and Conversion

117. Plaintiff incorporates by reference all preceding paragraphs as though fully set forth herein.

118. Defendants intentionally interfered with Plaintiff's possessory interests in his Maryland driver's license, gray Nissan Frontier, keys, work tools, and personal effects.

119. Ivester retained and photographed, or caused the photographing and transmission of, Plaintiff's driver's license. Personal-device records display the identifiers "D. Jon" and "Maddox Corey" in the related thread, but the present record does not establish which participant photographed, transmitted, received, retained, or used the image. The presently unidentified federal officers—including "ICE Agent Jeremy" and, only if discovery establishes their federal status and personal participation, the participants provisionally identified as "D. Jon" and "Maddox Corey"—opened or exercised control over Plaintiff's vehicle to the extent established by discovery while removing him and taking him into custody. After Plaintiff was transported away, his truck remained away from the main highway with its doors unlocked, keys visible on the driver's seat, and work tools inside.

120. To the extent the evidence establishes an unauthorized exercise of dominion, detention, use, or disposition inconsistent with Plaintiff's rights, that conduct constituted trespass to personalty or conversion under Georgia law.

121. As a direct and proximate result, Plaintiff lost possession, use, or control of his property and incurred property-related, transportation, economic, and consequential losses.

COUNT VI-C

Negligence

(Pled Only to the Extent Not Barred by Immunity or the Intentional-Tort Rule)

122. Plaintiff incorporates by reference all preceding paragraphs as though fully set forth herein.

123. In the alternative to the intentional-tort allegations, and only to the extent Georgia law recognizes a negligence theory independent of the intentional detention and arrest, the applicable Defendants owed Plaintiff duties of reasonable care in handling his identification and personal property, securing or arranging for the safekeeping of his unattended vehicle, keys, tools, and effects, and communicating or transferring custody without creating an unreasonable risk of foreseeable injury.

124. Those Defendants breached the applicable duties by mishandling or exposing Plaintiff's identifying information or property, failing to secure or arrange reasonably for his vehicle and effects after removing him from the

roadside, or otherwise acting without reasonable care in the nonintentional, ministerial aspects of the custody transfer.

125. The applicable Defendants knew or reasonably should have known that leaving Plaintiff unable to protect his vehicle, keys, work tools, identification, and personal effects created a foreseeable risk of property loss and consequential economic harm.

126. The negligence directly and proximately caused Plaintiff's property-related, transportation, economic, emotional, and consequential damages. This subcount is asserted only to the extent permitted by Georgia law and not barred by sovereign, governmental, official, statutory, or other immunity.

Common Allegations Applicable to Count VI

127. Plaintiff alleges that Ivester acted with actual malice and with the actual intent to commit the wrongful acts alleged herein, including intentionally detaining Plaintiff without lawful authority and intentionally continuing the detention for immigration-related purposes unrelated to any lawful traffic mission.

128. Plaintiff does not presently assert a state-law damages claim against any county, municipality, sheriff's office, official-capacity defendant, or other governmental entity except to the extent a valid waiver of immunity is

established. Plaintiff reserves the right to seek leave to amend if discovery identifies an applicable waiver, insurance coverage, statutory authorization, or other basis for such liability.

129. WHEREFORE, Plaintiff requests compensatory damages, special damages, consequential damages, punitive damages against individual Defendants to the extent authorized by law, attorney's fees and litigation expenses where authorized by law, prejudgment and post-judgment interest, costs of court, and such other relief as the Court deems just and proper.

COUNT VII

Loss of Consortium

Supplemental Jurisdiction

Against the Defendants Liable for the Underlying Georgia-Law Torts

130. Plaintiff Yanira Lizeth Hernández Andrade incorporates by reference all preceding paragraphs as though fully set forth herein.

131. Yanira and Jose were legally married before February 20, 2026 and remained married throughout the events and injuries alleged herein.

132. As a direct and proximate result of the actionable injuries inflicted upon Jose through the Georgia-law torts alleged in Counts V and VI, Yanira has been deprived of and suffered impairment to Jose's companionship,

affection, comfort, society, assistance, services, support, shared household responsibilities, and the ordinary benefits of their marital relationship.

133. The loss and impairment began when Jose was prevented from returning home and communicating with Yanira, continued through his confinement and the family's payment of a $10,000 immigration bond, and persist through the financial, employment, monitoring, immigration, and emotional consequences alleged herein.

134. Yanira's consortium claim is derivative of Jose's viable underlying Georgia-law tort claims but belongs to Yanira in her own right.

135. WHEREFORE, Yanira demands compensatory damages for loss of consortium in an amount to be determined by the evidence and awarded by the finder of fact, together with costs, interest, and such other relief as the Court deems just and proper.

COUNT VIII

Intentional Infliction of Emotional Distress (Pled in the Alternative)

Supplemental Jurisdiction

By Plaintiff Yanira Lizeth Hernández Andrade Against Defendant Adam Ivester

136. Plaintiff Yanira Lizeth Hernández Andrade incorporates by reference all preceding paragraphs as though fully set forth herein.

137. Yanira alleges that Defendant Adam Ivester acted intentionally or with reckless disregard of the near certainty that his conduct would cause her severe emotional distress. Ivester allegedly used official authority to seize and hold Jose for immigration-related investigation and transfer, prevented Jose from returning home, and caused or participated in circumstances under which Jose was removed without notice to his family and was not permitted to contact Yanira.

138. Yanira alleges that the conduct was extreme and outrageous when considered in its full context, including Ivester's alleged intentional misuse of a traffic detention to facilitate civil immigration custody without lawful authority; the discriminatory selection and treatment alleged herein; the knowing isolation of a husband and father from his family; the failure to provide notice or permit communication; the exposure of his unattended

work vehicle, keys, and livelihood tools; and the alleged recurring, coordinated enforcement activity directed toward immigrant construction workers.

139. Ivester knew or recklessly disregarded that Jose lived with and supported his wife and three children, or that abruptly removing and holding a motorist without allowing family contact would foreseeably cause severe distress to the spouse awaiting his return.

140. As a direct and proximate result, Yanira spent the night searching through hospitals, emergency services, law-enforcement agencies, and immigration authorities without knowing Jose's location or condition; confronted his abandoned and unsecured work truck the next morning; lost the household's primary income; experienced severe fear, anxiety, anguish, and family disruption; and has continued to endure distress associated with Jose's detention, bond, electronic monitoring, removal proceedings, employment restrictions, and risk of renewed detention. Ex. 12 ¶¶ 5–15; Ex. 13 ¶¶ 3–7, 11.

141. Yanira's emotional distress was and remains severe, genuine, and beyond the ordinary upset associated with a routine traffic encounter.

142. WHEREFORE, Yanira demands compensatory damages, punitive damages to the extent permitted by Georgia law, litigation expenses where

authorized, costs, interest, and such other relief as the Court deems just and proper.

COUNT IX

Basis for Declaratory and Prospective Injunctive Relief

143. Plaintiff realleges all preceding paragraphs.

144. Plaintiff seeks declaratory and prospective injunctive relief concerning the continuing policies, customs, practices, training deficiencies, supervisory failures, referral procedures, detention practices, and coordinated local-federal enforcement activities alleged herein.

145. Plaintiff alleges that he remains subject to ongoing consequences of the challenged conduct and faces a continuing risk of future harm. Plaintiff continues to reside and work in northeast Georgia. He no longer drives or operates construction vehicles and now travels on public roadways only as a passenger, including in construction-related vehicles, within the area patrolled by Defendants. Plaintiff alleges that he therefore remains exposed to the challenged practices as an occupant and passenger.

146. Plaintiff alleges that legal remedies alone are inadequate to prevent future injury.

147. Plaintiff therefore seeks declaratory and prospective injunctive relief as authorized by federal law.

INJURIES AND DAMAGES

148. As a direct and proximate result of Defendants' acts and omissions, Plaintiff suffered loss of liberty, prolonged detention, deprivation of freedom of movement, physical discomfort, emotional distress, anxiety, mental anguish, family disruption, economic loss, lost income, property-related harm, transportation expenses, and other consequential injuries.

149. **Economic Damages.** Plaintiff's presently known economic damages include lost earnings arising from the interruption of his residential construction and remodeling work, including a remodeling job with an anticipated gross contract value of approximately $5,000 and a separate remodeling job with an anticipated gross contract value of approximately $45,000 that he lost because of his confinement in immigration detention before obtaining release on bond; the $10,000 immigration bond paid to secure his release; work limitations and lost opportunities associated with the electronic ankle monitor; transportation and recovery expenses associated with his seizure and separation from his vehicle; loss of use or control of his truck, tools, keys, and personal effects; and other financial

losses resulting from the events alleged in this Complaint. Plaintiff's spouse states that Plaintiff earned approximately $5,000 per month and served as the household's primary source of income. Additional economic damages remain under investigation and will be established through discovery, business records, wage records, tax records, billing records, expert analysis, and proof at trial.

150. **Immigration-Process Harm.** Plaintiff suffered delay and disruption of the immigration process already underway through his wife's approved Form I-130 petition and the planned Form I-601A waiver. The encounter with the police could have prejudiced him in his bond proceedings, as any encounter with police receives serious scrutiny in bond proceedings before the EOIR. The detention and ensuing removal proceedings required counsel to divert limited resources to emergency bond representation, removal defense, and compliance with release conditions and increased the cost, difficulty, and uncertainty of pursuing lawful status. Plaintiff remains in active removal proceedings arising from the events described herein, remains subject to continuing immigration-related consequences, and continues to incur legal expenses, employment limitations, uncertainty, and emotional distress associated with those proceedings. Perhaps most gravely, as a result of the alleged inducement of the apparatus of the criminal justice

system by the civil federal immigration agents to unlawfully stop or prolong stops has shifted and increased the burden allocated to him: whereas the exclusionary rule or suppression of evidence in criminal proceedings requires the state to carry the burden of proof, the exclusionary rule or suppression of evidence in administrative proceedings is Plaintiff's burden to bear, and now, though he was unlawfully apprehended or held by the terrible power of the criminal justice apparatus, he cannot enjoy the rights and privileges of those suffering criminal prosecution. Such burden-shifting and -enhancing, if done via an unlawful stop at its inception or in its extension, causes Plaintiff and his counsel additional prejudice and considerable resources in his removal proceedings.

151. Plaintiff also suffered substantial non-economic and dignitary injuries. Plaintiff experienced immediate and extreme fear when masked agents surrounded his work truck, opened its door, physically removed him, and placed him in handcuffs. While isolated from his family and surrounded by armed agents, Plaintiff feared that he could be beaten, mistreated, or killed. He prayed continuously for protection, endured hunger, thirst, and the need to use a restroom rather than risk requesting assistance, and experienced humiliation from the agents' alleged insults, dehumanizing language, coercive treatment, and discriminatory targeting. The encounter caused

profound emotional trauma that continues to affect Plaintiff, including continuing difficulty discussing the events, anxiety, mental anguish, and disruption of his spiritual, family, and community life.

152. Defendants' conduct also impaired Plaintiffs' marital and household relationship. Jose was prevented from returning home, denied the ability to contact Yanira, and separated from his family without notice while Yanira searched for him through hospitals, law-enforcement agencies, emergency services, and immigration authorities. The detention and its continuing consequences deprived Yanira of Jose's companionship, affection, comfort, society, assistance, services, support, shared household responsibilities, and the ordinary benefits of their marital relationship. Yanira seeks damages in her own right for loss of consortium as alleged in Count VII.

153. Yanira also suffered severe individual emotional injuries arising from the intentional or reckless conduct alleged in Count VIII, including fear, anxiety, anguish, financial insecurity, disruption of family life, and continuing distress associated with Jose's custody, release conditions, employment restrictions, removal proceedings, and risk of renewed detention.

ONGOING AND PROSPECTIVE HARM

154. Plaintiff remains subject to ongoing consequences arising from the challenged conduct, including active removal proceedings, continuing legal expenses, employment restrictions associated with electronic monitoring, and the risk of renewed detention. Plaintiff continues to reside and work in northeast Georgia. He no longer drives or operates construction vehicles and now travels on public roadways only as a passenger, including in construction-related vehicles, within the area patrolled by Defendants. Plaintiff alleges that the constitutional violations described herein were not isolated acts but arose from policies, customs, practices, training deficiencies, supervisory failures, referral procedures, and coordinated enforcement activities that continue to present a risk of future injury to him as an occupant and passenger. Plaintiff therefore seeks declaratory and prospective injunctive relief to prevent future constitutional violations and to require constitutionally adequate policies, training, supervision, documentation, and safeguards.

PUNITIVE DAMAGES

155. Plaintiff alleges that the individual Defendants acted intentionally, willfully, maliciously, recklessly, or with callous indifference to Plaintiff's

federally protected rights. Plaintiff further alleges that Defendants initiated or prolonged detention without adequate legal justification, facilitated or participated in immigration-related detention and transfer, engaged in discriminatory treatment, and consciously disregarded the risk that Plaintiff's constitutional rights would be violated. To the extent permitted by law, Plaintiff seeks punitive damages against the individual Defendants in their individual capacities.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that the Court:

A. Enter judgment in Plaintiffs' favor on all claims proven at trial;

B. Declare that the acts, detentions, referrals, transfers, policies, customs, practices, and enforcement activities proven at trial violated Plaintiffs' rights under the United States Constitution and other applicable law.

C. Preliminarily and permanently enjoin Defendants, to the extent authorized by law and supported by the evidence, from requesting, facilitating, or prolonging detentions beyond the time reasonably necessary to complete the traffic-related purpose of a stop for immigration-related investigation, referral, or transfer absent lawful authority, and require constitutionally adequate policies, training, supervision, documentation, records-preservation

procedures, and review concerning local participation in immigration-related enforcement activities.

D. Award compensatory damages in an amount to be determined by the evidence and awarded by the finder of fact;

E. Award Plaintiff Yanira Lizeth Hernández Andrade damages for loss of consortium in an amount established by the evidence and permitted under applicable Georgia law;

F. Award Plaintiff Yanira Lizeth Hernández Andrade compensatory damages on her intentional-infliction-of-emotional-distress claim and punitive damages against the liable individual Defendant to the extent permitted by Georgia law;

G. Award nominal damages where authorized by law;

H. Award punitive damages against the individual Defendants in their individual capacities to the extent permitted by law, but not against any governmental entity;

I. Award reasonable attorney's fees, litigation expenses, expert witness expenses where recoverable, and costs pursuant to 42 U.S.C. § 1988 and any other applicable provision of law.

J. Award taxable costs and lawful pre-judgment and post-judgment interest;

K. Grant such other and further legal or equitable relief as the Court deems just, proper, and appropriate.

DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury on all issues so triable.

SIGNATURE

DATED this 1st day of September, 2026.

Respectfully submitted,
/s/ Joshua McCall
Joshua McCall
Georgia Bar No. 280076
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Counsel for Plaintiffs

VERIFICATION OF JOSE CARLOS RIVAS DIAZ

I, Jose Carlos Rivas Diaz, declare under penalty of perjury under the laws of the United States that I have reviewed the foregoing Complaint and that the factual allegations based upon my personal knowledge are true and correct. The factual allegations concerning my personal experiences, detention, injuries, damages, and continuing consequences are based upon my personal knowledge. As to allegations based upon records, information, belief, or matters expected to be established through discovery, I believe them to be true.

Executed this 31st day of August, 2026.

Jose Carlos Rivas Diaz

VERIFICATION OF YANIRA LIZETH HERNÁNDEZ ANDRADE

I, Yanira Lizeth Hernández Andrade, declare under penalty of perjury under the laws of the United States that I have reviewed the portions of the foregoing Complaint concerning my personal knowledge, family, marriage, emotional distress, consortium damages, and related matters, and that those allegations are true and correct. The factual allegations concerning my personal experiences, injuries, damages, and continuing consequences are based upon my personal knowledge.

Executed this 31st day of August, 2026.

Yanira Lizeth Hernández Andrade