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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

Jane Doe,

Plaintiff,

v.

City of Los Angeles, Detective Graciela Salazar in her official and individual capacities, Detective Santos (first name unknown) in her official and individual capacities, and Does 1–25, in their official and individual capacities,

Defendants.

Case No.

COMPLAINT FOR:

(1) REPRODUCTIVE PRIVACY ACT (Cal. Health & Safety Code § 123460 *et seq.*);
(2) BANE CIVIL RIGHTS ACT (Cal. Civ. Code § 52.1);
(3) RALPH CIVIL RIGHTS ACT (Cal. Civ. Code § 51.7); AND
(4) CONFIDENTIALITY OF MEDICAL INFORMATION ACT (Cal. Civ. Code § 56 *et seq.*)

JURY TRIAL DEMANDED

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Attorneys for Plaintiff Jane Doe

Jane Doe ("Plaintiff") brings this action against City of Los Angeles (the "City"), Detective Graciela Salazar, Detective Santos (first name unknown), and Does 1–25 ("Defendants"), and alleges:

INTRODUCTION

1. The City of Los Angeles and its employees detained Jane Doe, shackled her to her hospital bed, interrogated her, threatened her with criminal prosecution for homicide, and verbally abused her for hours while she was suffering the aftermath of a stillbirth. Even more cruelly, Defendants continued to unlawfully investigate Ms. Doe for homicide for a year after. To prevent exactly this sort of state intrusion into people's autonomy over their own bodies, California legislators amended the Reproductive Privacy Act in 2022 to prohibit the state from taking punitive action against people "based on their actions or omissions with respect to their pregnancy or actual, potential, or alleged pregnancy outcome, including miscarriage, stillbirth, or abortion, or perinatal death due to causes that occurred in utero." Cal. Health & Safety Code § 123467. Defendants blatantly violated Ms. Doe's rights, causing her extreme and ongoing harm and mental duress.

2. Ms. Doe is unhoused, suffers from epilepsy, and has a history of trauma. In November 2024, Ms. Doe went to Good Samaritan Hospital in Los Angeles, California for severe stomach pains. To her shock, hospital staff told her that she was pregnant and actively miscarrying a deceased first-trimester fetus, then sent her home to pass the deceased fetus alone.

3. In truth, Ms. Doe was approximately 29 weeks pregnant with a deceased fetus, and had just been sent home to deliver the deceased fetus without any medical assistance or even an accurate diagnosis.

4. After Ms. Doe returned to the city shelter where she lived, her stomach pains became increasingly debilitating. Late that night, she went to a communal bathroom stall and began passing large clots of blood and tissue over the toilet. Terrified by what was happening with her body, Ms. Doe left the bathroom to find help.

5. Ms. Doe found someone to call 9-1-1 for medical assistance. But when the paramedics arrived, they initially refused to transport her because her hospital records from earlier that day indicated she was merely experiencing a first-trimester miscarriage. Ms. Doe insisted that

the paramedics take her to a hospital, afraid that if left alone she would continue to bleed until she died.

6. The paramedics took Ms. Doe to Los Angeles General Medical Center ("LA General"). There, hospital staff admitted her to the emergency room immediately, informing her that she had suffered significant blood loss. After examining Ms. Doe, they informed her she had passed the fetus and her body was continuing to pass the remaining tissue.

7. Ms. Doe's trauma should have ended there, but it did not. Two Los Angeles Police Department ("LAPD") officers arrived and had her escorted to an isolated patient room. The officers grabbed each of Ms. Doe's arms, pulled them away from her body, and cuffed them to the gurney guardrails on either side of her head. They did not explain their presence or their conduct.

8. LAPD detectives eventually entered Ms. Doe's room and informed her she was a murder suspect based on the discovery of a fetus in an alley outside a shelter. Ms. Doe explained that she wasn't even aware that she had passed the fetus at her shelter that night, and that another hospital had told her that the fetus was already deceased.

9. Ms. Doe showed the detectives her discharge papers from Good Samaritan Hospital corroborating her diagnosis, but the detectives nonetheless continued their interrogation for hours.

10. The LAPD officers eventually removed the handcuffs and left the hospital without making a formal arrest. LA General discharged Ms. Doe later that night and she returned to her shelter, where both residents and strangers began accusing her of being a "baby killer" based on the police activity and news reporting on her miscarriage.

11. Approximately three months later, LAPD Detectives Salazar and Santos contacted Ms. Doe and told her they were investigating her for a variety of possible charges, including first-degree murder, based on their unfounded and obviously wrong insistence that Ms. Doe had given birth and then thrown a living newborn baby from a window. LAPD and the City continued to pursue this investigation aggressively for a year despite Ms. Doe's medical records confirming from the onset of the investigation that her fetus had died in utero. During this time, Defendants made multiple inflammatory and harmful public statements regarding Ms. Doe in response to heightened public interest around the incident.

12. After a year of investigating Ms. Doe, Defendants stated in writing that the City Attorney had closed the investigation but reserved the right to continue to pursue charges against her. This left Ms. Doe in continued limbo and wracked with fear and anxiety.

13. Defendants' cruel and unjustified criminal investigation violated Ms. Doe's rights and caused her prolonged emotional trauma.

14. Ms. Doe now brings this suit for injunctive relief and damages for the unlawful treatment she received from City employees when she was at her most vulnerable.

JURISDICTION AND VENUE

15. The Court has jurisdiction under California Code of Civil Procedure § 410.10 because the events giving rise to this action occurred and continue to occur in Los Angeles County, California.

16. The Court has jurisdiction over Defendants City of Los Angeles, Detective Graciela Salazar, Detective Santos, and Does 1–25 because they committed the actions alleged in this Complaint in Los Angeles County, California.

17. Venue is proper in this Court under California Code of Civil Procedure §§ 393–395 because all Defendants reside or do business in Los Angeles County, California, and because the facts giving rise to the claims occurred here.

PARTIES

18. **Jane Doe.** Jane Doe is and has been a resident of Los Angeles, California, at all relevant times. When she was a baby, Ms. Doe was diagnosed with a seizure disorder and epilepsy, which require a mix of anticonvulsant medications that Ms. Doe has taken throughout her life. Due to this disability, Ms. Doe has difficulty working and has relied on the Los Angeles shelter system for housing. Despite her challenging circumstances, Ms. Doe had built a full life centered on close friends, her shelter community, and her volunteer community at her church.

19. **City of Los Angeles.** The City is a municipal corporation formed under the laws of the State of California. The City is responsible for the actions of its employees under California Government Code § 815.2, including employees of the LAPD, the Los Angeles Fire Department, and the City Attorney's Office. The City, through the actions of its employees, threatened Ms. Doe

with prosecution for murder due to her miscarriage, in direct violation of laws protecting Ms. Doe from prosecution due to her pregnancy outcome.

20. **Detective Graciela Salazar.** On information and belief, Detective Graciela Salazar is an employee of the LAPD. Her badge number is 38597. Detective Salazar questioned Ms. Doe and accused her of homicide while Ms. Doe was shackled to her hospital bed at LA General in Los Angeles. Detective Salazar continued to aggressively investigate Ms. Doe about the events that occurred in Los Angeles related to Ms. Doe's miscarriage. Detective Salazar is sued in her official and individual capacities for declaratory and injunctive relief, and for money damages.

21. **Detective Santos.** On information and belief, Detective Santos (first name unknown) is an employee of the LAPD. Detective Santos questioned Ms. Doe and accused her of homicide while Ms. Doe was shackled to her hospital bed at LA General in Los Angeles. Detective Santos continued to aggressively investigate Ms. Doe about the events that occurred in Los Angeles related to Ms. Doe's miscarriage. Detective Santos is sued in her official and individual capacities for declaratory and injunctive relief, and for money damages.

22. **Does 1–25.** On information and belief, Does 1–25 are employees of the City of Los Angeles. Does 1–2 are the two unknown male LAPD officers who applied the restraints shackling Ms. Doe to her hospital bed during her interrogation at LA General in Los Angeles ("Officer Does"). Does 3 and 4 are the Los Angeles Fire Department paramedics who responded to Ms. Doe's shelter in Los Angeles on November 14, 2024, after Ms. Doe asked for emergency services to be called and transported her to LA General ("Paramedic Does"). Does 5–15 are employees of the Los Angeles City Attorney's Office, including attorneys employed by that office, who pursued the investigation against Ms. Doe ("City Attorney Does"). Does 16–25 are the supervisory and policymaking City employees directing the actions of the employees interacting directly with Ms. Doe and later investigating her. Does 1–25 are employed by the City of Los Angeles, and their actions either took place in or were related to events occurring in Los Angeles. The identities of Does 1–25 are currently unknown. The Complaint will be amended to include their identities as soon as they are discerned. They are on notice of this action as employees of Defendant City of Los

Angeles. Does 1–25 are sued in their official and individual capacities for declaratory and injunctive relief, and for money damages.

23. Detective Graciela Salazar, Detective Santos, and Does 1–25 are referred to collectively as "Individual Defendants."

FACTUAL ALLEGATIONS

A. Ms. Doe is told she is pregnant and miscarrying.

24. In November 2024, Ms. Doe was living in the Weingart Center shelter in Los Angeles, California.

25. On November 11, 2024, Ms. Doe began experiencing severe abdominal pain. The pain continued and increased in intensity over the next two days.

26. On November 13, 2024, the pain became physically unbearable. Ms. Doe had initially tried to continue her daily activities, which on this day included volunteering at her church on Skid Row. However, the pain became so bad that she left her volunteer shift early to seek medical help.

27. Ms. Doe went to the Good Samaritan Hospital emergency room. After an examination, a nurse told Ms. Doe that she was pregnant with a deceased fetus, and her pain was her body miscarrying the fetus.

28. Ms. Doe was shocked at her pregnancy diagnosis. She thought her missed menstrual periods had been because of her physician's adjustment of her anticonvulsant medication a few months earlier, as the medication had previously caused her to have sporadic or skipped periods. Ms. Doe also had no other symptoms of pregnancy, nor had she ever previously experienced being pregnant.

29. The nurse told Ms. Doe that her symptoms and the significant pain were normal for a miscarriage and that the deceased fetus would pass on its own. The nurse provided no other guidance. Instead, she handed Ms. Doe a pamphlet describing what to expect from a first-trimester miscarriage, then discharged her from the hospital.

30. Good Samaritan did not tell Ms. Doe the true results of the ultrasound it conducted: its records of that ultrasound show that Ms. Doe had experienced intrauterine fetal demise, with absent fetal heartbeat, of a 28–30 week fetus.

B. Ms. Doe's pain and bleeding intensify, and she seeks medical help.

31. Ms. Doe continued to suffer severe physical pain after her return to the shelter. At around 1:00 a.m. it escalated to the point where she could not sleep, so she made her way to the fourth-floor communal bathroom. She entered an empty stall and sat down on the toilet, at which point she began passing large clots of blood.

32. Fearing for her life, Ms. Doe left the bathroom to find help. She did not flush the toilet as she left.

33. Down the hall, Ms. Doe found a security guard she knew, Danielle, and told her she was bleeding uncontrollably and needed to call 9-1-1.

34. Paramedic Does 3 and 4, both paramedics with the Los Angeles Fire Department, arrived at the shelter in response to Ms. Doe's 9-1-1 call.

35. Ms. Doe told the paramedics that she was bleeding heavily, that she felt weak, and that she was afraid for her life given the amount of blood lost. She continued to visibly bleed through her pajama pants during this conversation.

36. The paramedics reviewed Ms. Doe's discharge papers from Good Samaritan, then told her that she did not need to go to a hospital because she was merely experiencing the miscarriage she had been diagnosed with. They did not address Ms. Doe's ongoing vaginal bleeding.

37. Afraid that the paramedics were leaving her to die, Ms. Doe insisted that they take her to a hospital. Paramedic Does 3 and 4 relented and escorted her downstairs to the ambulance. The paramedics had Ms. Doe sit on a bench inside the ambulance instead of the gurney for the duration of the drive to the hospital. They did not evaluate Ms. Doe's physical condition or provide any medical treatment on the way to the hospital.

38. Paramedic Does 3 and 4 took Ms. Doe to LA General. They arrived at approximately 2:53 a.m., and reported Ms. Doe's symptoms of vaginal bleeding, pain, and

weakness. Ms. Doe also had her Good Samaritan discharge papers with her, which a staff member took for a short period of time before returning the papers to her.

39. Ms. Doe underwent more than a dozen examinations with a series of physicians, residents, and nurses. The hospital staff there told Ms. Doe she had miscarried. Ms. Doe's LA General medical records confirm that Ms. Doe had passed the fetus but retained tissue in her uterus, causing her to continue to bleed heavily and necessitating admission to the hospital for treatment.

C. Defendants accuse Ms. Doe of murder and interrogate her for hours while she is receiving medical treatment.

40. As Ms. Doe's last examination was finishing, two LAPD Officers—Officer Does 1 and 2—suddenly arrived at the entrance to her examination room. Ms. Doe's genitals were shielded from the officers' view only by a thin privacy curtain, which caused her additional trauma because she had not been in such an exposed examination position since undergoing a rape kit as a child.

41. Officer Does 1 and 2 asked medical staff to move Ms. Doe by wheelchair into a patient room so that the officers could speak with her alone.

42. Hospital staff wheeled her into an unoccupied patient room, with Officer Does 1 and 2 following immediately behind, and placed her on the gurney in a seated recline position. The hospital staff then left Ms. Doe alone in the patient room with Officer Does 1 and 2.

43. Once alone with Ms. Doe, Officer Does 1 and 2 approached Ms. Doe on both sides and pulled out handcuffs. They each took one of Ms. Doe's wrists, lifted them away from her body, and cuffed them to the adjacent gurney railings. This position forced Ms. Doe's arms into an unnatural position and prevented her from using or fully resting either arm.

44. Officer Does 1 and 2 refused to explain why they were handcuffing Ms. Doe to the gurney nor did they inform Ms. Doe of her rights despite her being detained. Instead, they told her they could not tell her anything until detectives arrived.

45. Ms. Doe's hands began to feel numb within the first hour of being shackled. At some point in the first couple hours, the cuffs began to dig into her wrists as gravity and exhaustion left her arms sagging against the restraints.

46. On information and belief, Ms. Doe was left shackled for approximately two hours before two LAPD detectives—Defendants Detective Graciela Salazar and Detective Santos—arrived at the hospital with a medical examiner from the County of Los Angeles Medical Examiner, and at least one unknown female detective. After the detectives arrived, Officer Does 1 and 2 posted themselves outside the patient room with the door open.

47. Detective Salazar told Ms. Doe that the LAPD was investigating a homicide and that Ms. Doe was the main suspect. They did not tell her how they had identified her.

48. On information and belief, Detectives Salazar and Santos identified Ms. Doe as a suspect after Paramedic Does 3 and 4 provided both Ms. Doe's identity and her medical information to the detectives earlier that morning without Ms. Doe's knowledge or consent.

49. Detective Salazar then informed Ms. Doe that a fetus had been found outside of Ms. Doe's shelter in an alley. They told Ms. Doe that when they investigated the shelter, they saw blood on the communal bathroom window.

50. This was the first time Ms. Doe learned that she had passed the fetus while bleeding into the toilet. And it was the first time she heard that someone had reportedly moved the fetus from the toilet to an alley outside the shelter.

51. Ms. Doe informed the detectives of her miscarriage diagnoses from both Good Samaritan Hospital and LA General.

52. Because Ms. Doe was shackled, she could not retrieve her Good Samaritan discharge papers. Instead, she told the detectives and medical examiner that her discharge papers were in the brown bag next to her. The medical examiner retrieved and examined the discharge papers.

53. While reviewing the discharge papers, the medical examiner said, "Oh, fetal demise." Ms. Doe asked what that meant. The medical examiner explained to the room that fetal demise meant "the fetus had no heartbeat."

54. The medical examiner handed the discharge papers to Detectives Salazar and Santos. Both detectives looked through the papers.

55. On information and belief, Detectives Salazar and Santos read in the discharge papers that the fetus was already deceased before the miscarriage. Nonetheless, they proceeded with a multi-hour interrogation, forcing Ms. Doe to recount her entire experience in detail while she was dizzy and fatigued from blood loss and sleep deprivation, as well as suffering the physical strain and intimidation of being handcuffed to her gurney by both hands in a painful position.

56. Detectives Salazar and Santos badgered Ms. Doe with questions such as, "Are you sure you didn't see a fetus? Don't you know what a baby looks like?" for at least an hour, despite having medical records on hand confirming that the fetus had been deceased prior to Ms. Doe passing it.

57. Ms. Doe remained shackled throughout the interrogation. As the detectives ended their questioning, they briefly uncuffed one of Ms. Doe's wrists and asked her to sign something—she does not know what she signed. She does not recall ever being advised of her rights. When they removed the handcuffs, Ms. Doe saw that the cuffs had left chafe marks on both of her wrists.

58. After ending the interrogation, Detectives Salazar and Santos and Officer Does 1 and 2 did not apologize to Ms. Doe for shackling her. They did not explain what next steps they might take or whether Ms. Doe should expect to hear from them again. They did not ask for a copy of Ms. Doe's medical records confirming fetal demise, even though they had viewed them at the hospital. After hours of shackling and harshly interrogating a woman still bleeding and being treated after suffering a stillbirth, Defendants simply provided Ms. Doe with Detective Salazar's business card and left.

D. Ms. Doe faces threats, insults, and accusations of being a "baby killer" after returning to the shelter from the hospital.

59. The hospital discharged Ms. Doe a few hours after the LAPD Defendants left. On her discharge documentation, the hospital wrote that "[m]iscarriage is not your fault. It didn't happen because you did something wrong."

60. When Ms. Doe arrived back at the shelter, she discovered both fellow residents and strangers had congregated near the entrance. When they saw Ms. Doe, they began a barrage of

aggressive and hostile comments, such as, "I thought you were dead; we heard you passed away," and "baby killer, you deserve to die," and "don't let me catch you outside, I'll kill you."

61. Ms. Doe escaped into the shelter. Later that day, two shelter security guards moved Ms. Doe from her fourth-floor bed to a room on the third floor for her own safety.

62. The next morning, November 15, 2024, Ms. Doe proactively called Detective Santos to let her know that she had been discharged.

63. Around this time, local news began publishing stories reporting on the discovery of fetal remains at the shelter. The stories included sensationalizing comments from LAPD spokespeople, including one article in the *Los Angeles Times* reporting that an LAPD spokesperson said that the fetus had been pronounced dead after possibly having been dropped from the fourth-floor bathroom of a nearby building.[1]

64. In the same *Los Angeles Times* article, police officials reported that a woman had been detained and released pending further investigation, suggesting Ms. Doe had committed some crime requiring detention and investigation.

65. Even as Ms. Doe's name was not disclosed in this news coverage, the details regarding the location of the incident and the unnamed woman's transfer to a hospital allowed residents to identify Ms. Doe as the subject.

66. In the wake of this news coverage, the third-floor program director at the shelter told Ms. Doe not to leave the building for her own safety. Shelter employees also told Ms. Doe that she would need to be safety-transferred to a different shelter because people believed she was a "baby killer" and were threatening to kill her.

67. Ms. Doe was transferred to a nearby building in Los Angeles.

E. Defendants spend twelve months threatening Ms. Doe with murder charges.

68. Detectives Salazar and Santos contacted Ms. Doe multiple times in the months after her hospitalization, and continued to aggressively investigate her for what they said were potential

[1] *See* Sandra McDonald, *Newborn boy found dead on Skid Row was dropped from fourth floor, police say*, Los Angeles Times (Nov. 14, 2024 at 6:20pm), https://www.latimes.com/california/story/2024-11-14/newborn-boy-found-dead-on-skid-row-police-say.

criminal charges arising from the miscarriage. Throughout their investigation, the detectives insisted that Ms. Doe had committed a crime, even as contemporaneous medical records and Ms. Doe's own statement confirmed no crime had occurred.

69. On February 6, 2025, Detective Salazar texted Ms. Doe and asked her to call back. Ms. Doe called Detective Salazar, who then re-launched her interrogation of Ms. Doe for an hour. Detective Salazar then informed Ms. Doe that the LAPD was pursuing the possibility of multiple criminal charges against her, including first-degree murder.

70. Defendants' threatened prosecution for a crime that never happened further traumatized Ms. Doe. In response to this pressure and retraumatization, Ms. Doe became suicidal. Eventually, the shelter was able to connect her to resources, including legal defense, to provide her additional support.

71. Defendants' investigation continued for a total of twelve months.

72. The entire time the investigation was pending, Ms. Doe was terrified about what might happen. She did not know how to handle the overwhelming fear and anxiety. Sometimes she felt as if she wanted to die from fear.

73. During this time, Ms. Doe lost her appetite and no longer wanted to interact with anyone. She rarely felt willing or able to meet with any friends, and she stopped volunteering at her church—a deeply meaningful place to her where she had volunteered for five years—because people there were threatening to hurt or kill her for allegedly killing a baby. Ms. Doe's feelings of isolation persisted throughout the time Defendants conducted their investigation.

74. Due to Defendants' ongoing threats Ms. Doe found criminal defense counsel to represent her while Defendants investigated her for homicide.

75. Detective Salazar told Ms. Doe's defense counsel on April 1, 2025 that the LAPD would be presenting the case to the City Attorney. Detective Salazar said that "other females experiencing this seek help" and "there's a reason [Ms. Doe] passed the remains by herself and was hiding it."

76. In the months that followed, Ms. Doe's defense counsel fielded multiple requests from the City Attorney's Office for more and more materials for a case that should have been an obvious non-starter.

77. LAPD's investigation did not stop at Ms. Doe. On information and belief, in the summer of 2025, Detective Salazar questioned Danielle, the security guard at the Weingart Center who was stationed at the Center's central security hub the night of Ms. Doe's stillbirth and had been the one to call paramedics. Detective Salazar interrogated Danielle, who did not personally know Ms. Doe, accusing her of lying and conspiring with Ms. Doe to "conceal" her pregnancy. By this time, on information and belief, Detective Salazar had long been aware of the County of Los Angeles Medical Examiner's March 11, 2025 official determination that cause of the death of Ms. Doe's fetus was "intrauterine fetal demise" and that the manner of death was "natural."

78. During this time, officers Ms. Doe had never met would address her by name when they were at her residential building. Ms. Doe also continued to receive menacing comments from acquaintances and strangers in her community who knew of the November 2024 incident and how it was reported and investigated.

F. Defendants formally decline to file charges in November 2025.

79. In early November 2025, Ms. Doe's criminal defense attorney informed her that the City had decided not to pursue charges against her.

80. In November 2025, Ms. Doe and her counsel met with the City Attorney's Office at its behest. A City attorney asked her to recount her story over and over. Ms. Doe did not understand why she had to relive her experience if no charges were being filed. It was unclear to her whether Defendants were intending to drop the investigation after all.

81. Finally, on November 21, 2025, Michael R. Louthian from the City Attorney's Office sent Ms. Doe a letter stating that the City Attorney's Office had ended its investigation and would not be bringing criminal charges. However, the letter expressly reserved the right to file charges up until the statute of limitations expired. The letter limited supposed charges to a violation of Cal. Health & Safety Code § 7054(a)(1), depositing or disposing of human fetal remains in a

place other than a cemetery—a misdemeanor—rather than any of the more serious charges they alleged and investigated her for.

G. Ms. Doe has suffered trauma and harm as a result of Defendants' conduct.

82. Defendants' unjustified treatment of Ms. Doe in the immediate aftermath of her stillbirth and their subsequent year-long intimidation campaign left Ms. Doe with lasting physical and emotional trauma.

83. To date, Ms. Doe suffers from periodic episodes of extreme emotional stress where she involuntarily relives the events of November 13, 2024 and everything that followed.

84. Ms. Doe also suffered reputational and dignitary harm because of Defendants' conduct in criminally investigating her. She was labeled a "baby killer" and "murderer" at the shelter where she lived and was told she deserved to die. She was forced to transfer to a different building for her own safety. She also lost her church community of five years because people there were threatening to hurt or kill her.

H. Ms. Doe meets her notification responsibilities under the Government Claims Act.

85. On May 11, 2026, as required by California Government Code § 911.2, within six months after Defendants' course of conduct concluded with the issuance of the declination letter from the City Attorney's Office, Ms. Doe filed a claim with the City of Los Angeles seeking damages against Defendants for their violation of the Tom Bane Civil Rights Act, the California Reproductive Privacy Act, and California common law, among other bases for relief.

86. The City of Los Angeles did not respond to or acknowledge Ms. Doe's claim and has, pursuant to California Government Code § 912.4(c), constructively denied Ms. Doe's claim.

CLAIMS FOR RELIEF

Count I
Violation of the Reproductive Privacy Act (Health & Safety Code § 123460 *et seq.*)

87. Ms. Doe re-alleges and incorporates by reference the preceding allegations in this Complaint as if fully set forth herein.

88. The Reproductive Privacy Act states that no person shall "be subject to civil or criminal liability or penalty […] based on their actions or omissions with respect to their pregnancy or actual, potential, or alleged pregnancy outcome, including miscarriage, [or] stillbirth." Cal. Health & Safety Code § 123467. By subjecting Ms. Doe to detainment, interrogation, investigation and the threat of criminal prosecution because of her miscarriage, Defendants repeatedly took exactly the sorts of actions the Act forbids.

89. The Act further prohibits the state from "deny[ing] or interfer[ing] with" a person's fundamental right to bear a child, including interference with "postpartum care" and "miscarriage management." Cal. Health & Safety Code § 123462.

90. The "state" is defined as "the State of California, and every county, city, town and municipal corporation," meaning that the City of Los Angeles is subject to the Act. Cal. Health & Safety Code § 123464(c).

91. The Reproductive Privacy Act provides a private right of action against state actors that violate its provisions. Cal. Health & Safety Code § 123469.

92. Through the conduct alleged above, Defendants violated the Act.

93. Each Individual Defendant is liable for a violation of the Act. Defendant City of Los Angeles is liable for the actions of its employees, which were undertaken within the scope of their employment. *See* Cal. Gov't Code § 815.2.

Count II
Violation of Bane Civil Rights Act (Civ. Code § 52.1)

94. Ms. Doe re-alleges and incorporates by reference the preceding allegations in this Complaint as if fully set forth herein.

95. Under the Bane Act, a person shall not "interfere[] by threat, intimidation, or coercion, or attempts to interfere by threat, intimidation, or coercion, with the exercise or enjoyment by any individual or individuals of rights secured by … the Constitution or laws of this state." Cal. Civ. Code § 52.1(b).

96. Defendants violated Ms. Doe's constitutional and statutory rights including:

- **Cal. Health & Safety Code § 123467.** Defendants violated California's Reproductive Privacy Act by threatening Ms. Doe with criminal prosecution and aggressively investigating her for homicide because of her stillbirth.
- **Cal. Health & Safety Code § 123462.** Defendants further violated Ms. Doe's rights under the Reproductive Privacy Act by interfering with Ms. Doe's post-stillbirth care.
- **Cal. Civ. Code § 56.10.** Defendants, specifically Paramedic Does 3 and 4, violated Ms. Doe's rights under the Confidentiality of Medical Information Act by providing Ms. Doe's confidential medical information to LAPD without a subpoena or court order.
- **Cal. Const. art. I, §§ 1, 1.1.** Defendants violated Ms. Doe's constitutional right to privacy under California Constitution article I, section 1 and her right to reproductive freedom under California Constitution article I, section 1.1.
- **Cal. Const. art. I, § 13.** Defendants violated Ms. Doe's right to be free from unreasonable seizure under California Constitution article I, section 13 when they shackled Ms. Doe to a gurney and interrogated her for hours without probable cause.

97. In violating Ms. Doe's rights, Defendants acted with threat, intimidation, or coercion. "[T]he criminal investigation, arrest, or prosecution, or threat of investigation, arrest, or prosecution, of a person with respect to their pregnancy or actual, potential, or alleged pregnancy outcome, constitutes 'threat, intimidation, or coercion' pursuant to Section 52.1 of the Civil Code." Cal. Health & Safety Code § 123469(d)(2).

98. Further, Defendants acted with reckless disregard for Ms. Doe's right to be free from unreasonable seizure, because they subjected her to arrest and interrogation even though they knew or should have known that they could not have had probable cause to arrest her because of the protections provided in the Reproductive Privacy Act. *See* Cal. Health & Safety Code § 123467. This is enough to establish coercion under the Bane Act. *Cornell v. City & Cnty. of San Francisco*, 17 Cal. App. 5th 766, 804 (2017).

99. Defendants' actions in violation of the Bane Act caused Ms. Doe physical and psychological harm. Her hands went numb and she had marks on her wrists from the restraints applied to her during the unreasonable seizure, and she suffered extreme distress, terror, and eventual suicidality during the investigation in violation of the Reproductive Privacy Act and her constitutional right to reproductive freedom.

100. Defendant City of Los Angeles is liable for the actions of its employees, which were undertaken within the scope of their employment. *See* Cal. Gov't Code § 815.2.

Count III
Violation of Ralph Civil Rights Act (Civ. Code § 51.7)

101. Ms. Doe re-alleges and incorporates by reference the preceding allegations in this Complaint as if fully set forth herein.

102. The Ralph Civil Rights Act provides protection from "violence, or intimidation by threat of violence, committed against their persons or property" on account of their sex. Cal. Civ. Code § 51.7(b)(1). "Sex" includes "pregnancy, childbirth, or medical conditions related to pregnancy or childbirth." Cal. Civ. Code § 51(e)(6).

103. Through the conduct alleged above, Defendants violated the Act.

104. Defendant City of Los Angeles is liable for the acts of its employees, which were undertaken within the scope of their employment. *See* Cal. Gov't Code § 815.2.

Count IV
Violation of Confidentiality of Medical Information Act (Civ. Code § 56 *et seq.*)

105. Ms. Doe re-alleges and incorporates by reference the preceding allegations in this Complaint as if fully set forth herein.

106. On information and belief, Defendants Paramedic Does 3 and 4 violated the Confidentiality of Medical Information Act by providing Ms. Doe's confidential medical information to LAPD without Ms. Doe's knowledge or consent, including that Paramedic Does 3 and 4 had just transported Ms. Doe—a pregnant woman with pelvic bleeding—to LA General.

107. Ms. Doe did not give authorization for the release of this information to LAPD.

108. LAPD did not present Paramedic Does 3 and 4 with a warrant, a court order, or a subpoena.

109. Paramedic Does 3 and 4's disclosure to the LAPD was not permitted by any exception to the general prohibition on disclosing medical information.

110. These actions harmed Ms. Doe. On information and belief, LAPD relied on Paramedic Does 3 and 4's unlawful disclosure of Ms. Doe's confidential medical information in going to LA General, disrupting Ms. Doe's medical care, detaining and interrogating Ms. Doe, and subsequently investigating Ms. Doe for murder for a year.

111. Defendant City of Los Angeles is liable for the actions of its employees, which were undertaken within the scope of their employment. *See* Cal. Gov't Code § 815.2.

PRAYER FOR RELIEF

WHEREFORE, on the basis of the foregoing, Plaintiff requests that this Court enter judgment in her favor and issue the following relief:

A. Declaratory and injunctive relief;

B. Punitive damages;

C. Compensatory damages;

D. Exemplary damages;

E. Attorneys' fees and costs;

F. Such other and further relief as the Court deems just and proper.

Dated: November 12, 2026

Respectfully submitted,

BRAUNHAGEY & BORDEN LLP

By: */s/ Matthew Borden*
Matthew Borden

Attorneys for Plaintiff

JURY DEMAND

Plaintiff hereby demands a trial by jury on all causes of action and claims so triable.

Dated: November 12, 2026

Respectfully submitted,

BRAUNHAGEY & BORDEN LLP

By: */s/ Matthew Borden*
Matthew Borden

Attorneys for Plaintiff