

**STATE OF NEW MEXICO
COUNTY OF DOÑA ANA
THIRD JUDICIAL DISTRICT**

**MARIO BANDA-ALICEA,
TYLER COLE, JONATHAN
SILVA, JEREMY DEAN SMITH,
MARIO CARRASCO, ZACHARY
GONZALES,**

Plaintiffs,

v.

No.

**BOARD OF COUNTY COMMISSIONERS
OF THE COUNTY OF DOÑA ANA
COUNTY d/b/a DOÑA ANA COUNTY
DETENTION CENTER,**

Defendant.

COMPLAINT FOR DAMAGES, INJUNCTIVE AND DECLARATORY RELIEF

For years, Doña Ana County Detention Center's corrections officers have embarked on a terror campaign using paramilitary operations, violent midnight operations, training drills on actual detainees, surprise flash bang grenades, and other threatening and harmful conduct. The officers' actions subject detainees to anxiety, fear, and uncertainty daily, never knowing when their pod will be the next one subjected to inhumane paramilitary tactics or for what innocuous behavior they might be targeted. These unwarranted and abusive operations at the Doña Ana County Detention Center do nothing to further security or safety and egregiously violate the rights of the people housed within the detention center.

COME NOW, Plaintiffs Mario Banda-Alicea, Tyler Cole, Jonathan Silva, Jeremy Dean Smith, Mario Carrasco, and Zachary Gonzales (collectively, "Plaintiffs"), and hereby bring claims pursuant to the New Mexico Civil Rights Act, NMSA 1978, §§ 41-4A-1 through -13 (2021), for

injunctive relief, and for declaratory relief pursuant to the Declaratory Judgment Act, NMSA 1978, §§ 44-6-1 through -15 (1975) against the above-named Defendant, and state the following upon knowledge, information and belief.

PARTIES, JURISDICTION, AND VENUE

1. **Plaintiff Mario Banda-Alicea** is a resident of Las Cruces, New Mexico. He was in custody at Doña Ana County Detention Center (“DACDC” or “detention center”) for approximately seven months in total between May 2023 and December 2023. He is currently located in the Federal Bureau of Prisons facility in Florence, Colorado.

2. **Plaintiff Tyler Cole** is a resident of Silver City, New Mexico. He was detained at DACDC from September 2024 until April 2025. He is currently detained in Luna County Detention Center.

3. **Plaintiff Jonathan Silva** is a resident of Las Cruces, New Mexico. He was in custody at DACDC between June 2023 and July 2025. He is currently located in Central New Mexico Correctional Facility in Los Lunas, New Mexico.

4. **Plaintiff Jeremy Dean Smith** is a resident of Tularosa, New Mexico. He was detained at DACDC from April 2023 to May 2025. He is currently located in Cibola County Correctional Facility.

5. **Plaintiff Mario Carrasco** is a resident of Salem, New Mexico. He is currently detained in DACDC, where he has spent a total of approximately eighteen (18) months between December 2021 and the present.

6. **Plaintiff Zachary Gonzales** is a resident of Hobbs, New Mexico. He was detained at DACDC for approximately nine months between July 2023 and April 2024. He is currently located in the Federal Bureau of Prisons facility in Florence, Colorado.

7. **Defendant Board of County Commissioners of Doña Ana County d/b/a Doña Ana County Detention Center** is sued pursuant to NMSA 1978, § 4-46-1.

8. Defendant is a “public body” within the meaning of the New Mexico Civil Rights Act, NMSA 1978, § 41-4A-2 (2021).

9. Defendant operates Doña Ana County Detention Center, which is located in Las Cruces, New Mexico within Doña Ana County.

10. Defendant houses both state and federal pre-trial detainees in DACDC while their criminal cases are adjudicated, as well as some individuals serving short sentences after conviction.

11. Upon information and belief, DACDC deployed its Special Operations Response Team (“SORT”) as early as 2019.

12. Although SORT officers are not “certified law enforcement officers,” and notice was therefore not required under the Act,¹ in an abundance of caution Plaintiffs nonetheless timely submitted written notice to Defendant of their intent to pursue this civil action pursuant to the New Mexico Civil Rights Act, NMSA 1978, § 41-4A-13 (2021).

13. This Court has jurisdiction over the parties and the subject matter of this litigation and venue is proper pursuant to NMSA 1978, § 38-3-1 (1981).

FACTUAL ALLEGATIONS

Special Operations and Response Team at the Doña Ana County Detention Center

14. Upon information and belief, in 2019, a group of security officers called the Special Operations and Response Team began operating within DACDC as a “paramilitary” group of officers who are required to know, among other competencies, the use of deadly force, “conceptual pod dynamic domination,” “controlled F.O.R.C.E. operations,” and breaching operations.

¹ “Certified law enforcement officers” are those who have received certification from New Mexico’s Law Enforcement Academy Board. NMSA 1978, § 29-7-6.

15. The previous year, Defendant DACDC contracted with the private company Tactical and Operations Group of the United States (“TOG-US”) to bring in operatives to provide military tactics training to a select group of corrections officers within the detention center.

16. Upon information and belief, the first officers trained under this program graduated in 2019 and, shortly thereafter, Defendant unleashed them within DACDC.

17. DACDC describes SORT as a group of corrections officers trained to handle “high risk situations,” including riots, evacuations, and all other situations that “fall outside the abilities of regular officers.”

18. SORT officers utilize Special Weapons and Tactics (SWAT) equipment including, but not limited to, tactical vests with plate inserts, shotguns, AR-15s, 9mm weapons, and gas masks.

19. According to DACDC, SORT is also “intended to be used *only* as control measures and *only when necessary*.”

20. In theory, SORT should be “considered the last resort in resolving a situation.”

21. Since 2019, when those initial officers finished the SORT training program, Defendant has allowed the SORT to terrorize individuals in DACDC at any time of day, including late in the night after the housing units (also called “pods”) have been locked up, or early in the morning while everyone is asleep.

22. SORT conducts random, violent operations when no critical incidents have occurred or are occurring.

23. SORT unnecessarily escalates routine cell shakedowns into excessive force situations, for, upon information and belief, practice using their special tactical gear and to run training scenarios.

24. SORT storms the pod, weapons drawn, while people are simply playing cards, watching TV, getting a haircut, or engaged in Bible study.

25. SORT conducts unwarranted operations at any time of day, or night, using paramilitary tactics and psychological warfare against individuals who are not resisting and who are compliant with SORT's erratic and unusual commands.

26. SORT operations at DACDC often begin with team members firing Bore Thunder flash bangs without warning, cause, or provocation, including when detainees are asleep.

27. A Bore Thunder is a 12-gauge muzzle flash bang that produces approximately 174 decibels of sound.

28. 150 decibels can burst a person's ear drum, and even short-term exposure to any sound above 140 decibels can cause permanent damage.

29. After firing flash bangs and disorienting detainees in the pod, SORT officers often shout conflicting commands such as one officer yelling "on your feet" while another officer shouts "get on the ground," causing confusion.

30. In response to the confusion they have created, SORT officers will fire off additional flash bang rounds, further escalating the unwarranted encounters and abuse.

31. Video evidence shows that even when detainees in the pod are compliant with their commands, SORT officers still point their guns, threaten, or use actual physical force against them.

32. Upon information and belief, some of these violent SORT operations are done as part of training new SORT officers; in other words, SORT trains officers using military tactics and riot weapons on unsuspecting detainees who have done nothing wrong.

33. Sometimes, SORT uses tasers or other weapons on compliant, restrained individuals simply because they ask questions about why they are being abused.

34. During strip searches, members of DACDC staff, including SORT officers, point tasers at detainees' genitals, telling them that if they make any sudden movements, or if any contraband is found on them, they will be tased in the genitals.

35. Sometimes, SORT officers point non-lethal guns with rubber bullets at detainees' genitals during strip searches with the same threats.

36. There is no legitimate purpose or reason for a correctional officer to point weapons at detainees' genitals.

37. These actions also violate the Prison Rape Elimination Act.

38. SORT and DACDC officers engage in this behavior for the sole purpose of humiliating, degrading, and frightening detainees.

39. As a direct result of the SORT's abusive tactics at DACDC, individuals housed within the detention center have suffered emotional distress, psychological injuries, dignitary harm, and physical injuries.

Specific examples of SORT's Terror Campaign

40. One example of SORT's unjustified violence occurred on **November 21, 2023**, while people were watching TV, playing cards, and even getting a haircut.

41. Without provocation, the first SORT officer through the door discharged a Bore Thunder flash bang inches away from two individuals in the middle of a haircut.



Screenshot from DACDC security video footage of November 21, 2023, SORT incident

42. The next three officers tackled these two disoriented men and shoved them face down before handcuffing and hauling them out of the room.

43. SORT officers told other individuals to get on their stomachs and escorted them out of the pod, all while SORT officers pointed guns in their direction.

44. Once again, there was nothing taking place that would warrant these violent and humiliating tactics, which are designed for extreme situations like riots.

45. SORT also terrorizes individuals in DACDC early in the morning while the vulnerable detainees are still asleep.

46. This behavior has caused individuals in DACDC to suffer severe insomnia and sleep deprivation, with constant anxiety that they will be violently awoken if they do fall asleep.

47. On **August 8, 2024**, SORT conducted two operations in the same pod at DACDC: one at 4 a.m. and the other at 7 a.m.

48. At 4 a.m. on August 8, 2024, officers stormed the pod firing Bore Thunder flash

bangs to wake everyone up in terror.

49. Despite being stunned by the flash bangs, the individuals in the pod complied with officers' demands.

50. Even with this compliance, SORT officers rushed to individual cells shouting threats to tase the half-asleep and disoriented occupants, who were face-down on the floors of their cells, with their hands on their heads.

51. SORT would not allow detainees to clothe themselves before ordering them to be escorted out of their cells; many, if not all, of the detainees in the pod were taken out at taser-point.

52. Allowing no time for the detainees in the pod to recover, less than 3 hours after the 4 a.m. attack, officers again stormed the pod while firing a Bore Thunder flashbang, disorienting detainees and causing confusion.

53. SORT officers also forced those showering to crawl out of the showers naked.

54. Once again, none of the detainees were displaying violent, aggressive, or threatening behavior.

55. On **March 8, 2025**, at 4:41 AM SORT conducted another operation while detainees were still asleep.

56. Lapel footage from Chief Trujillo and Operator Kehres shows the SORT running into a dark pod and firing two Bore Thunder Flashbangs one after another and screaming for everyone to get on the ground.

57. SORT members then go around to every cell screaming "get on the ground" while violently banging on the doors of the cells.

58. Operator Kehres then walks back to the main door of the pod and brings in, upon information and belief, SORT trainees to participate in the ensuing operation drill.

59. After a few minutes of screaming, officers finally turn on the lights in the pod.

60. SORT officers then begin opening the cells and instructing detainees to get off the floor and get dressed.

61. While detainees are complying with orders, SORT officers have tasers and non-lethal shotguns pointed at them, despite no signs of resistance or violence.



Screenshot from Operator Kehres' lapel camera during the March 8, 2025, operation

62. These unwarranted SORT operations are not isolated incidents.

63. Instead, for years SORT has conducted a campaign of terror, engaging in violent and unwarranted operations at DACDC.

64. Upon information and belief, SORT has conducted at least one hundred and twelve (112) such violent operations since January 2023.

65. Upon information and belief, Defendant and its officers attempt to manufacture situations that might theoretically justify SORT intervention by placing detainees in housing situations they know to be volatile or by sowing misinformation about detainees in an attempt to

incite violence.

66. Upon information and belief, Defendant sometimes transfers detainees into housing units they know will be dangerous in retaliation for questioning their methods or seeking legal advice.

67. Upon information and belief, some SORT operations carried out on unsuspecting detainees are designed to be training exercises.

68. During many of its operations, SORT used physical force, in addition to psychological warfare, against groups and individuals without any provocation or cause to do so.

69. These operations made individuals detained in DACDC live in a constant state of fear and severe anxiety.

70. Some detained individuals describe the feeling as that of living in a war zone.

71. When detained individuals submit grievances to report the behavior of SORT officers or to ask questions about their treatment, often the grievances are not reviewed by a neutral party.

72. Instead, if an incarcerated person submits a grievance about a specific officer, that officer might be the one to respond and close the grievance without further investigation or corrective action.

73. Upon information and belief, when individuals submit grievances to DACDC, the SORT officers often review and respond to those grievances.

74. For example, Plaintiffs Mario Banda-Alecia and Tyler Cole grieved the SORT officers' actions through the grievance process on their tablets.

75. SORT officers, such as Lieutenant Powell, the commander of the SORT, closed their grievances without taking any action to correct the SORT's behaviors or to answer questions

asked in the grievances.

76. These unchecked abuses of power caused Plaintiffs to suffer a deprivation of their rights, privileges, and/or immunities as secured pursuant to the Bill of Rights of the Constitution of New Mexico.

Plaintiffs' Individual Experiences with the SORT

Plaintiff Mario Banda-Alicea

77. Most recently, Plaintiff Maria Banda-Alicea entered DACDC on May 15, 2023, and was released December 29, 2023, while he awaited trial and/or sentencing.

78. While in DACDC, Mr. Banda-Alicea suffered through countless SORT operations.

79. Mr. Banda-Alicea submitted grievances regarding SORT operations occurring in his pods.

80. Mr. Banda-Alicea now takes medications for PTSD because of the psychological damage he suffered as a result of SORT's terror tactics at DACDC.

81. He has also experienced nightmares about the SORT, including nightmares that the officers are going to hurt him.

82. Mr. Banda-Alicea feels SORT's inhumane treatment rendered him nothing more than a guinea pig during the training raids.

83. Mr. Banda-Alicea suffered damages as a result of Defendant's unlawful conduct.

Plaintiff Tyler Cole

84. Plaintiff Tyler Cole was detained in the DACDC from April 2023 until April 2025, while he awaited trial and/or sentencing.

85. SORT especially targeted Mr. Cole because he chose to participate in the substance abuse program at DACDC, through which he took prescribed suboxone.

86. SORT performed “shakedowns” of Mr. Cole’s pod at least once a month, sometimes more, from July 2023 to April 2024, because of his and other people’s participation in the substance abuse program.

87. As with most of SORT’s operations, SORT did not uncover any contraband drugs when it targeted Mr. Cole.

88. Between January and March 2025, Mr. Cole was directly informed by SORT officers that his pod was being used to train new SORT cadets.

89. Mr. Cole lives in a constant state of fear, unease and anxiety because of SORT conducting psychological warfare in his pod.

90. Mr. Cole has spent time in other detention facilities but has never been terrorized at a facility like he was at DACDC, where officers come in shooting Bore Thunder flashbangs and less lethal shotgun rounds at non-threatening, non-violent detainees.

91. Mr. Cole suffered damages as a result of Defendant’s unlawful conduct.

Plaintiff Jeremy Dean Smith

92. Plaintiff Jeremy Dean Smith was detained in the DACDC from April 2023 until April 2025, while awaiting trial and/or sentencing.

93. Mr. Smith witnessed many of the events outlined in this Complaint.

94. Mr. Smith lived in several different pods in his time at DACDC.

95. SORT raided his pod four times in the first two weeks he was there.

96. In one of these raids, SORT officers shot directly into his cell, rather than away from people, as they supposed to do for safety reasons.

97. The officer fired his flashbang so close to Mr. Smith he could feel the force of the ammunition as it passed his legs.

98. SORT sows confusion during its operations by issuing conflicting commands then becomes enraged when people are unsure which officer to listen to, unnecessarily escalating the already-tense situations and causing the detainees to suffer emotional distress, fear, and anxiety.

99. Mr. Smith compared SORT's tactics to those used in war.

100. Mr. Smith has suffered severe effects from the violence to which SORT subjected him.

101. He says that when the people who know him on the outside see him, it will be obvious to them that something terrible happened to him, because he is not the same person he was.

102. He says that before DACDC, he was a people person, but SORT's actions changed him, they took a "people person" and made him paranoid and afraid.

103. He says no matter what, now he walks on eggshells, afraid he will get in trouble for something innocuous and unexpected, like having a pen.

104. Mr. Smith has been incarcerated before but never experienced anything like the abuse he suffered in DACDC.

105. Anytime he hears someone yelling, his heart rate spikes because he experiences flashbacks causing him to perceive that it's a SORT officer yelling at him.

106. Mr. Smith was prescribed medication to help him cope with his PTSD from the SORT raids at DACDC.

107. Mr. Smith suffered damages as a result of Defendant's unlawful conduct.

Plaintiff Mario Carrasco

108. Plaintiff Mario Carrasco has been detained in DACDC for a total of approximately eighteen (18) months between December 2021 and the present.

109. Mr. Carrasco returned to DACDC in May 2025 due to a parole violation. As of the filing of this Complaint, he is still detained in the jail.

110. Mr. Carrasco experienced many SORT attacks in the wee hours of the morning.

111. He also witnessed, and experienced, having tasers pointed at his and his cellmate's faces as they were ordered out of their cells.

112. Before being detained in DACDC, Mr. Carrasco slept well.

113. He now experiences nightmares about SORT.

114. He is so scared of an unexpected SORT attack that he barely sleeps, instead lying awake with racing heart and thoughts.

115. Mr. Carrasco has attempted to get help from mental health professionals at DACDC.

116. DACDC officers are also retaliating against Mr. Carrasco for talking with his lawyers and because he assists Spanish-speaking detainees navigating the jail.

117. DACDC officers told Mr. Carrasco that they knew what he was saying to his lawyers and that he had better stop helping people or there would be consequences.

118. Upon information and belief, shortly after that conversation, in early October 2025, DACDC officers purposefully put Mr. Carrasco in a position to be attacked by a group of nine or ten other detainees.

119. Neither DACDC officers nor the SORT intervened at any point during the attack.

120. Mr. Carrasco suffered, and continues to suffer, damages as a result of Defendant's unlawful conduct.

Plaintiff Jonathan Silva

121. Plaintiff Jonathan Silva was a detainee in DACDC from June 14, 2023, until July

26, 2025, while awaiting trial and/or sentencing.

122. Mr. Silva has 75% hearing loss and wears hearing aids to help him get through daily life.

123. In the November 6, 2024, SORT attack, officers entered his cell and shot a flashbang near Mr. Silva's head.

124. Mr. Silva's right hearing aid broke from the noise of the blast, and his left one barely functioned.

125. DACDC did not get Mr. Silva's hearing aids fixed or replaced for almost four months, making it hard for him to function.

126. On July 7, 2025, in the very early morning, Mr. Silva was getting hot water for his coffee from the shower area.

127. SORT officers came into the pod and started yelling conflicting commands at everyone, including some instructions to get on the ground and to crawl to the officers.

128. Mr. Silva did not have his hearing aids in, because officers had not taken him to charge them the day before and the battery was dead.

129. Therefore, he could not clearly hear the officers' orders.

130. Mr. Silva tried to take a step closer to better hear what was going on.

131. SORT officers then tased Mr. Silva apparently because he was unable to hear, and therefore comply with, the commands being issued.

132. In addition to his personal experiences with SORT, Mr. Silva has also witnessed many instances of SORT shooting into cells unprovoked.

133. Mr. Silva suffered damages as a result of Defendant's unlawful conduct.

Plaintiff Zachary Gonzales

134. Plaintiff Zachary Gonzales was detained in DACDC from July 2023 until April 2024, while awaiting trial and/or sentencing.

135. The incidents at DADC continue to impact Mr. Gonzales whenever he hears a loud noise or yelling and he immediately experiences a fight or flight response.

136. He is always stressed and evaluating whether he might be doing something wrong without knowing it—because at DACDC, he could never predict when or why the SORT might inflict violence upon him.

137. Mr. Gonzales suffered damages as a result of Defendant’s unlawful conduct.

SORT’s Social Media Platforms

138. Plaintiffs’ undersigned counsel has been investigating these claims since 2023, when they first became aware of Defendant’s malfeasance.

139. Plaintiffs’ undersigned counsel sent a preservation letter to Doña Ana County on June 17, 2024, instructing it to preserve all records related to Plaintiffs’ claims.

140. Since then, Plaintiffs’ counsel has submitted numerous Inspection of Public Records Requests (“IPRA”) relating to DACDC’s SORT operations, including requests for video footage.

141. While DACDC complied with these IPRA requests by producing some responsive public records, upon information and belief, key pieces of evidence were either erased or not maintained by DACDC.

142. Additionally, during its investigation, Plaintiffs’ counsel learned that the SORT had its own YouTube channel and Instagram account.

143. On or around April 3, 2025, counsel discovered that the SORT’s YouTube and Instagram accounts had been deleted or removed.

COUNT I:
Violation of Article II, Section 13 of the New Mexico Constitution
(Cruel and Unusual Punishment)
Or, in the alternative,
Violation of Article II, Section 18 of the New Mexico Constitution (Due Process)

144. Plaintiffs reincorporate all preceding paragraphs as if fully restated herein.

145. The New Mexico Civil Rights Act, NMSA 1978, §§ 41-4A-1 through -13 (2021) provides that individuals may bring suit against government entities for violations of the New Mexico Bill of Rights.

146. Article II, Section 13 of the New Mexico Constitution prohibits the government from imposing cruel and unusual punishments.

147. As such, Article II, Section 13 prohibits the government from using excessive force against individuals in state or county custody.

148. Defendant violated Plaintiffs' right to be free from excessive force under Article II, Section 13 when it allowed SORT to perform unprovoked paramilitary operations within the DACDC, using weapons on compliant individuals where force was wholly unnecessary.

149. SORT's paramilitary tactics subjected Plaintiffs to force in circumstances during which it was evident that no force was required or called-for.

150. Upon information and belief, SORT used force against Plaintiffs for no purpose other than training new cadets.

151. Upon information and belief, SORT used force against Plaintiffs for no purpose other than creating terror and uncertainty.

152. SORT's paramilitary operations are grossly disproportionate to the needs of the detention facility and have put Plaintiffs in constant fear of serious injury or harm.

153. SORT's violent operations, conducted at all hours of the night and day, constitute

psychological torture in violation of Article II, Section 13.

154. DACDC subjected Plaintiffs to cruel and unusual punishment through SORT's campaign of terror using military tactics.

155. In the alternative, Plaintiffs allege that they have been denied due process under the New Mexico Constitution.

156. Article II, Section 18 of the New Mexico Constitution provides that each person in the State of New Mexico shall have the right to due process.

157. Defendant denied Plaintiffs their right to due process when it allowed and authorized SORT to use excessive force, via military tactics and psychological warfare, against Plaintiffs in a pretrial setting.

158. Defendant was objectively unreasonable in allowing the SORT unit to use unwarranted and unjustified paramilitary tactics on pretrial detainees.

159. Defendant was objectively unreasonable in allowing or instructing SORT to train cadets using actual detainees.

160. Plaintiffs are entitled to damages to compensate them for the harms and losses inflicted upon them by Defendant's actions.

161. Plaintiffs have been harmed by Defendant's actions.

COUNT II

Spoliation of Evidence

162. Plaintiffs reincorporate all preceding paragraphs as if fully restated herein.

163. Defendant created unnecessary and unlawful barriers to the Plaintiffs' ability to timely access evidence.

164. Upon information and belief, Defendant engaged in conduct designed to manufacture false facts, and to conceal, distort, spoliage, or otherwise alter material facts regarding

SORT.

165. Defendant was aware of the likelihood of litigation.

166. Upon information and belief, Defendant's non-production and manipulation of SORT's social media platforms was done knowingly and intentionally for improper, self-serving purposes.

167. Upon information and belief, Defendant's conduct was designed to deter, prevent, weaken or undermine a potential lawsuit by Plaintiffs.

168. Defendant's non-disclosure, concealment, manipulation, and deletion is the legal equivalent of destroying, mutilating, or altering evidence, which activities at a minimum should warrant sanctions, an adverse inference jury instruction, and support a cause of action for Intentional Spoliation of Evidence.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court:

A. Declare, pursuant to the Declaratory Judgment Act, that Defendant Board of County Commissioners for Doña Ana County, acting by and through the Doña Ana County Detention Center ("DACDC"), violated Plaintiffs' right to be free from cruel and unusual punishment, or in the alternative, Plaintiffs' right to due process, when it subjected them to unwarranted, excessive, paramilitary and psychological warfare tactics that were grossly disproportionate to the situations described herein;

B. Issue an injunction preventing the Special Operations and Response Team at Doña Ana County Detention Center from engaging in future unconstitutional operations such as those described herein;

C. Award damages to compensate Plaintiffs for the physical and psychological harm

they suffered as a result of Defendant's conduct;

D. Award costs and reasonable attorney fees to Plaintiffs pursuant to Section 41-4A-5 of the New Mexico Civil Rights Act; and

E. Grant such further relief as this honorable Court deems just and proper.

Respectfully submitted,

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