

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

ASHLEY SCHARDEIN, SYDNEY SISK, and
ASHTON MATTINGLY

Plaintiffs,

v.

CASE NO. 26-CV-1719

CORECIVIC, INC., a Maryland Corporation;
TERRENCE DICKERSON, in his individual
capacity; TREY DILL, in his individual capacity;
DAMIAN JAUREGUI, in his individual capacity;
WILLIAM CHRISTIAN, in his individual
capacity; and REUBEN ACOSTA, in his
individual capacity;

Jury Trial Demanded

Defendants.

FIRST AMENDED COMPLAINT

Plaintiffs Ashley Schardein, Sydney Sisk, and Ashton Mattingly, (collectively “Plaintiffs”), by and through counsel of record, hereby sue CoreCivic, Inc., Terrence Dickerson, Trey Dill, Damian Jauregui, William Christian, and Reuben Acosta (collectively “Defendants”), and allege as follows:

INTRODUCTION

1. Cimarron Correctional Facility hosted a network of systemic rape, coercion, and cover-up. Correctional officers, in concert with their supervisors, created a complex scheme to gain access to female inmates and sexually assault them. The correctional officers maintained a culture of silence through coercion, threats, and gifts. Despite obvious signs, including some identified by Defendant Warden Dickerson, CoreCivic and its employees continued to place inmates in situations where they knew that they would be sexually assaulted. For victims, it was “Cima-Rape.”

JURISDICTION AND VENUE

2. This court has jurisdiction over this action pursuant to 18 U.S.C. §§ 1589, 1591, and 1593.
3. Venue is proper because the facts giving rise to Plaintiffs’ claims occurred within the Western District of Oklahoma.

PARTIES

4. Plaintiff Ashley Schardein is a 30-year-old woman. She was incarcerated in Cimarron Correctional Facility from 2022 through 2025.
5. Plaintiff Sydney Sisk is a 30-year-old woman. She was incarcerated in Cimarron Correctional Facility from 2022 through 2024.
6. Plaintiff Ashton Mattingly is a 34-year-old woman. She was incarcerated in Cimarron Correctional Facility from 2022 through 2023, again in May and June of 2024, and once again in August and September of 2025.
7. Defendant CoreCivic, Inc. is a Maryland corporation with its principal place of business in Brentwood, Tennessee. CoreCivic operates private correctional and detention facilities throughout the United States, including Cimarron Correctional Facility. The United States government contracts with CoreCivic to house inmates in federal custody. At all times material to this complaint, CoreCivic Inc., owned and operated Cimarron Correctional Facility.
8. Defendant Trey Dill is over 18 years old and was employed as a correctional officer by CoreCivic at all times material to the complaint.
9. Defendant Damian Jauregui is over 18 years old and was employed as a correctional officer by CoreCivic at all times material to the complaint.
10. Defendant William Christian is over 18 years old and was employed as a correctional officer by CoreCivic at all times material to the complaint.
11. Defendant Reuben Acosta is over 18 years old and was employed as a correctional officer by CoreCivic at all times material to the complaint.
12. Defendant Terrence Dickerson is over 18 years old and was employed as a warden by CoreCivic at all times material to the complaint.

FACTS

CoreCivic's System of Trafficking Female Inmates to Correctional Officers at Cimarron for Sexual Assault

13. Congress enacted the Prison Rape Elimination Act ("PREA"), 34 U.S.C. §30301, *et seq.*, in 2003 to establish national standards for preventing sexual abuse in correctional facilities, requiring facilities to follow precise procedures for preventing and reporting sexual assault and sexual harassment.
14. CoreCivic, which runs Cimarron through its contract with the United States and houses individuals in the custody of the United States, is bound by PREA regulations.
15. In 2022, there were eleven allegations of sexual assault by an inmate against an employee at Cimarron; four were substantiated. It's the second-most of any CoreCivic facility.
16. CoreCivic operated the Cimarron facility with insufficient staff in 2022.
17. As a result of this understaffing, CoreCivic leadership at the Cimarron facility permitted male correctional officers unlimited and unsupervised access to female inmates.
18. CoreCivic leadership at the Cimarron facility permitted male correctional officers to trade pod assignments to have access to female inmates who they were assaulting.
19. CoreCivic leadership at the Cimarron facility did not have a system to detect or monitor correctional officers who changed pod assignments without permission.
20. CoreCivic leadership at the Cimarron facility would assign male correctional officers known to engage in sexually harassing behavior to work in female-occupied pods.
21. Even after there were an adequate number of female correctional officers to work in female-occupied pods, certain male officers continued to request placement in the pods, switch assignments with other officers, or visit the pods during their shifts.
22. Defendants Jauregui and Dill, as well as another correctional officer, Lamarcus Dewayne Edwards, often tried to get into the female-occupied pods. Defendants Acosta and

Christian, as captains, were able to enter the female-occupied pods whenever they wanted and would often stay for extended periods of time.

23. It was not until 2025 that the female-occupied pods were regularly fully staffed with female correctional officers, fogged glass was put in the windows in the female-occupied pods for privacy, and female and male inmates were no longer sharing the Segregated Housing Unit ("SHU").
24. Correctional officers would regularly not report other correctional officers if they suspected them of sexually assaulting female inmates or observed them doing so.
25. Facility leadership, including the Warden and Assistant Warden, would not investigate signs of sexual assault or misconduct.
26. It was well-known by facility staff and inmates that certain correctional officers pursued and engaged in sexual relationships with female inmates.
27. It was well-known by facility staff and inmates that certain correctional officers would give female inmates privileges, benefits, and gifts in exchange for sexual acts.
28. The Oklahoma Department of Corrections ended its contract with CoreCivic to house inmates in Cimarron in part because two correctional officers sexually assaulted inmates in 2017. Keaton Ross, *Oklahoma Ends Contract with Troubled Private Prison in Cushing*, Oklahoma Watch (July 16, 2020), <https://oklahomawatch.org/2020/07/16/oklahoma-ends-contract-with-troubled-private-prison-in-cushing/>.
29. Despite the U.S. Marshals Service's policy prohibiting showing partiality toward an inmate or former inmate or becoming sexually or emotionally involved with an inmate or former inmate, correctional officers engaged in sexual relationships with female inmates without intervention from CoreCivic leadership.
30. Despite the U.S. Marshals Service's policy prohibiting displaying favoritism or preferential treatment toward an inmate or providing an inmate with items, favors, or services, correctional officers gave female inmates privileges, benefits, and gifts without intervention from CoreCivic leadership.
31. Despite the U.S. Marshals Service's policy prohibiting sexual harassment and CoreCivic's policy prohibiting sexual abuse and sexual harassment, correctional officers made repeated romantic overtures, "flirted," and sexually harassed female inmates without intervention from CoreCivic leadership.
32. Despite CoreCivic's policies requiring that employees immediately report any suspicion or knowledge of sexual abuse or sexual harassment, provide written documentation of the incident, and take all such reports seriously, correctional officers did not report fellow officers who engaged in sexual harassment or committed sexual assaults and CoreCivic leadership did not discipline officers for failing to report.
33. Despite CoreCivic's policy requiring that an inmate who has been sexually abused and remains at risk of continued sexual abuse be protected, CoreCivic leadership failed to act to prevent further abuses.
34. CoreCivic leadership failed to act in response to reports of sexual assault, failed to investigate or intervene, failed to discipline employees who engaged in misconduct, and failed to address systemic issues at the facility that allowed employees to sexually assault and sexually harass female inmates.
35. CoreCivic failed to provide inmates with a realistic means of reporting sexual assault. Inmates were not adequately informed about PREA. Although there was a PREA hotline number next to the phone, the phone was located in an area where other inmates and correctional officers could hear the allegations.
36. CoreCivic employees, including facility leadership, did not take allegations of sexual assault seriously. Correctional officers who received reports of sexual assault and sexual harassment would "warn" the officer who was the subject of the complaint, fail to run the report up the chain of command, and retaliate against inmates for reporting by placing them in the SHU.
37. CoreCivic employees, including facility leadership, would also openly gossip about inmates who had been sexually assaulted and direct humiliating comments at victims,

discouraging them from reporting sexual assaults and sexual harassment.

38. In addition to Defendants Dill, Jauregui, Christian, and Acosta sexually assaulting Plaintiffs Schardein, Sisk, and Mattingly, as detailed further below, all four men and other correctional officers, sexually assaulted and harassed other female inmates.
39. Defendant Trey Dill placed a pen in his pants and offered it to Savanna Turcic, who retrieved it from his pants, and they began a sexual relationship. Defendant Dill also handed out tobacco pouches to inmates who showed him their breasts. Defendant Dill would ask inmates to engage in sexual acts while he watched them through the cell window.
40. Defendant Acosta had several “girlfriends” who were incarcerated at Cimarron, including a sexual relationship with an inmate named Stormy, before he sexually assaulted Plaintiff Sydney Sisk. In 2023, another inmate reported that Defendant Acosta directed sexual comments at her and, on multiple occasions in the pod office, put his hands under her shirt and down her pants to penetrate her vagina with his fingers. Defendant Acosta was also seen by inmates going into a closet alone with a female inmate at night after lockdown, with both of them exiting after a long time with disheveled clothes and hair. Defendant Acosta also made inappropriate sexual comments to Plaintiff Ashley Schardein, telling her that she was “sexy.”
41. Defendant Christian gifted a female inmate with whom he was engaged in a sexual relationship a gold necklace. In 2023, it was reported that the inmate would perform oral sex on Christian in exchange for favors and the necklace, the two were seen going into the pod office, and they would speak on the phone when Christian was not working in the facility.
42. Defendant Jauregui had a sexual relationship with Carolina Aguilar before he sexually assaulted Plaintiff Ashley Schardein.
43. Lamarcus Dewayne Edwards, a former CoreCivic employee at Cimarron, was indicted under 18 U.S.C. § 2243(b) (Sexual Abuse of a Ward) for knowingly engaging or attempting to engage in a sexual act with inmate “J.F.-S.” on or about June 18, 2023. On December 28, 2023, Edwards entered a plea of guilty to 18 U.S.C. § 2244(a)(4) (Abusive Sexual Contact).
44. In 2022, it was reported that a correctional officer stared at an inmate while she was undressing in her cell and winked at her, touched her hand and called her “beautiful,” and gave her a heads up about a cell search.
45. In 2023, it was reported that a correctional officer frequently visited the pod to see an inmate and brought them jewelry and food from the free world.
46. Correctional officer McGill, a female correctional officer, was also a frequent, known abuser. In 2023, it was reported that McGill was seen kissing an inmate and putting her hands down the inmate’s pants as well as touching the inmate’s face, hands, and hair. They were also seen in the pod office together and speaking on the phone when McGill was not working in the facility. She purchased steak, lobster, lavender oils, chocolate strawberries, and other items for an inmate named Cassi. This was known throughout the pod as the inmates frequently shared the contraband. One inmate wore McGill’s jacket in the pod as her own. It was well-known that McGill flirted with inmates. Other correctional officers and supervisors did not intervene or report the officer’s illicit behavior.
47. Defendant Warden Terrence Dickerson took weekly prison walkarounds. During this time, he would walk through the pods, greet inmates, and take an overall stock of the facility. On one occasion, Defendant Warden Dickerson noticed a Nike sweatshirt on a female inmate. The sweatshirt is illegal contraband and can only be obtained from outside of the facility. It was, in fact, a gift from a female correctional officer, McGill, with whom she was having a sexual relationship. Defendant Warden Dickerson confiscated the sweatshirt but ordered no further investigation into how it was obtained. Defendant Warden Dickerson found and confiscated a lot of illegal contraband that could only have come from the free world but never opened an investigation into the correctional officers who brought it in based on those discoveries.

48. Cimarron is not the only CoreCivic facility with allegations of widespread sexual assault. In facilities across the country, CoreCivic employees have been sexually assaulting and sexually harassing inmates while CoreCivic fails to investigate or report assaults.
49. In 2020, CoreCivic entered a memorandum of understanding with the San Diego County Sheriff's Office to allow the warden of the Otay Mesa Detention Center—a CoreCivic employee—to decide whether to investigate rape allegations at the facility. *See* Wendy Fry and Nigel Duara, *Why a private company is investigating rapes at an ICE detention center instead of the sheriff*, Cal Matters (March 25, 2026), available at <https://calmatters.org/justice/2026/03/otay-mesa-san-diego-sheriff/>. The memorandum came to light after it was reported that law enforcement had failed to investigate at least seven reported sexual assaults at the facility. *Id.* In 2024, it was reported that at least fourteen 911 calls made from the facility were related to PREA violations. *Id.* In 2025, twenty-one 911 calls were made related to PREA violations and seven of those calls alleged rape. *Id.* CoreCivic did not request local law enforcement involvement in any cases in 2025 and, as such, no investigations were opened and no reports were sent to prosecutors to consider criminal charges. *Id.*
50. In February 2025, an inmate at CoreCivic's Nevada Southern Detention Center in Pahrump, Nevada filed a lawsuit against CoreCivic for failing to investigate its employees despite knowing that they were committing physical and sexual assaults on inmates. Justine Verastigue, *Nevada corrections officer accused of sexually assaulting inmate*, Fox 5 (Feb. 21, 2025), available at <https://www.fox5vegas.com/2025/02/22/nevada-corrections-officer-accused-sexually-assaulting-inmate/>. The inmate alleged that a guard passed her explicit notes, trapped her in a closet where he masturbated in front of her, and raped her. *Id.*
51. In September 2025, an inmate who was sexually assaulted by a guard at CoreCivic's Otay Mesa Detention Center in San Diego, California filed a lawsuit alleging that a guard asked them to undress for a strip search and then forcibly performed oral sex on the inmate. *Roe v. CoreCivic, Inc., et al.* (3:25-cv-02471-GPC-DDL). After the assault, the guard ordered the inmate not to say anything. *Id.* In August 2024, it had been reported that an administrative complaint had been sent to the Department of Homeland Security and CoreCivic detailing the allegations. Billal Rahman, *Exclusive: US-Mexico Border Migrants Claim Sexual Assault By Detention Center Staff*, Newsweek (Aug. 8, 2024), available at <https://www.newsweek.com/us-mexico-border-migrants-sexual-assault-detention-staff-1930766>. In the same complaint, another inmate alleged that he had been groped by a CoreCivic employee after going through a metal detector. *Id.* Two other inmates also reported that, in 2019, they attempted to report sexual assaults while in custody and faced retaliation. *Id.*
52. In December 2023, it was reported that CoreCivic employees in understaffed facilities across Tennessee had been violating PREA by prematurely closing sexual assault investigations and failing to discipline employees with substantiated allegations of sexual harassment. Melissa Brown, *Audit says Tennessee prisons mishandled sex assault cases*, USA Today (Dec. 12, 2023), available at <https://www.usatoday.com/story/news/nation/2023/12/12/tennesse-prisons-federal-law-sexual-assault-cases/71898416007/>.
53. In July 2023, it was reported that a CoreCivic employee at the Stewart Detention Center in Lumpkin, Georgia assaulted five detainees while he was working as a nurse in the center's medical clinic. Morgan Till, Zeba Warsi, and Teresa Cebrián Aranda, *Investigation finds sexual assault claims against immigration officials routinely ignored*, PBS News Hour (July 21, 2023), available at <https://www.pbs.org/newshour/show/investigation-finds-sexual-assault-claims-against-immigration-officials-routinely-ignored>. One year earlier, the Southern Poverty Law Center announced that four women at the detention center had filed an administrative complaint with the Department of Homeland Security, copying CoreCivic. *'Abuse and*

Cover-Up: Complaint alleges sexual assault, retaliation at for-profit immigrant prison in Georgia, Southern Poverty Law Center (July 14, 2022), available at <https://www.splcenter.org/resources/stories/complaint-alleges-sexual-assault-retaliation-immigrant-prison/>. Two of the women had previously notified CoreCivic officials about the nurse who committed the sexual assault but were threatened with retaliation, legal action, prison time, and prolonged detention, and the nurse remained employed. *Id.*

54. In February 2023, the ACLU of New Mexico announced that CoreCivic's Torrance County Detention Facility in Estancia, New Mexico severely lacked compliance with PREA. *Torrance County Detention Facility Audit Reveals Troubling Sexual Abuse Policy Violations, Says ACLU-NM*, ACLU of New Mexico (Feb. 23, 2023), available at <https://www.aclu-nm.org/press-releases/torrance-county-detention-facility-audit-reveals-troubling-sexual-abuse-policy/>. An audit report reviewing cases from May 2019 to January 2022 found that facility staff repeatedly failed to report sexual abuse allegations. *Id.*
55. In August 2022, three inmates at CoreCivic's Otay Mesa Detention Facility in San Diego, California filed a lawsuit against a guard and his supervisor. Dorian Hargrove, *Three women sue over sexual assault and retaliation at Otay Mesa Detention Center*, CBS 8 (Aug. 8, 2022), available at <https://www.cbs8.com/article/news/investigations/alleged-sexual-abuse-and-retaliation-by-corecivic-guards-at-otay-mesa-detention-facility-in-san-diego/509-2e401b30-6414-400a-8b79-a5c96dede801>. The women alleged that the guard groped them while they slept, assaulted them during improper strip searches, and forced them to perform sexual acts. *Id.* The women further alleged that the guard's supervisor threatened them with solitary confinement if they reported the assaults. *Id.*
56. In December 2019, an inmate at CoreCivic's Saguaro Correctional Center in Eloy, Arizona filed a lawsuit against CoreCivic and its employees for sexual assault and retaliation. *Elizabeth Whitman, Inmate Says He Was Raped, Retaliated Against at CoreCivic Prison in Arizona*, Phoenix New Times (Dec. 17, 2019), available at <https://www.phoenixnewtimes.com/news/hawaii-inmate-alleges-rape-retaliation-at-saguaro-prison-arizona-11393143/>. The inmate alleged that after he was raped by a guard, he was put in a suicide cell and then later put in solitary confinement. *Id.* He further alleged he was prevented from calling his lawyer and the sexual assault reporting hotline. *Id.* The inmate alleged that the guard who assaulted him brought him sandwiches and cookies from the free world to buy his silence before she was internally investigated, fired, arrested, and sentenced to probation after pleading guilty to one charge of unlawful sexual conduct in a correctional facility. *Id.*
57. In November 2017, it was reported that two inmates at CoreCivic's T. Don Hutto Residential Center in Taylor, Texas had been assaulted by three guards. Ashley McElroy, *Letter details sexual assault at T. Don Hutto Residential Center*, Spectrum News 1 (Nov. 9, 2017), available at <https://spectrumlocalnews.com/tx/austin/news/2017/11/09/letter-details-sexual-assault-at-t-don-hutto-residential-center>. The inmate reported that she was questioned by CoreCivic officials after they received an anonymous call about the assault and the officials threatened her with solitary confinement. *Id.*

The Sexual Assaults of Ashley Schardein

58. Plaintiff Ashley Schardein struggled with isolation and depression while incarcerated at Cimarron.
59. Former Cimarron correctional officer Defendant Damian Jauregui was assigned to Ashley's pod and noticed her vulnerabilities and identified her as a target.
60. Jauregui would regularly speak with Ashley about her husband Billy who was also incarcerated at Cimarron.
61. In June 2022, Jauregui told Ashley, "I've been watching you." Unbeknownst to Ashley, Jauregui had been watching her on the security cameras for the past year and could tell her about specific things she had done at night. Jauregui pounced two weeks later.
62. Female inmates kept tablets in the pod office where correctional officers worked. Some inmates could also stay out late at night to clean. While Ashley was sometimes let out of

her cell for legitimate cleaning purposes, Defendants Jauregui and Acosta would let her out of her cell under the pretext of cleaning or needing her help but then bring her to the pod office instead, which made her feel uncomfortable.

63. In June 2022, Ashley asked Jauregui about her husband, Billy, who was also housed at Cimarron. She had conversed with Jauregui about Billy before. This time, Jauregui insulted Billy, so Ashley left. Ashley returned to the office to get her tablet at the end of her night cleaning shift.
64. Ashley asked Jauregui for her tablet. Jauregui stood and held the tablet, but did not hand it to Ashley. He told her to come in. Ashley refused to come in, hoping that Jauregui would merely hand her the tablet. Jauregui placed it on the table. Ashley walked into the small office to grab the tablet. Jauregui grabbed Ashley by her wrist, yanked her close, and forcibly kissed her. Ashley grabbed her tablet, ran out of the office, and into her cell.
65. Jauregui waited for ten minutes, then acted like he was doing a security round. Jauregui stopped at Ashley's cell, opened the door, and apologized. Ashley asked Jauregui to leave, and he did.
66. Jauregui knew that Ashley had been suffering from excessive bleeding due to an IUD extraction. He was advised to give Ashley extra tampons and napkins if she needed them. Ashley requested no extra napkins or tampons. However, Jauregui used her illness as an excuse to revisit Ashley's cell. He returned a third time, opened the door, and placed tampons and napkins in Ashley's cell. A few days later, Jauregui apologized, telling Ashley he merely had a crush on her. He continued to pursue Ashley over the next several months.
67. Jauregui was an intake officer, so he should not have been in the pods. However, Jauregui worked in the pods whenever the facility was short-staffed. Jauregui was also allowed free rein throughout the prison and would make a point of visiting Ashley in her pod between 6:30 p.m. and 6:30 a.m., usually when she was out of her cell, cleaning for the night.
68. After he forcibly kissed Ashley, he did not assault her again for months. He merely visited Ashley as a "friend" because he was one of the few friends she had, given the nature of her charges.
69. That changed on or about September 18, 2022. Jauregui relieved the female correctional officers in Ashley's pod at 8:30 p.m. He walked into the pod office and slammed the door, so Ashley went to the office to ask if he was okay. Ashley had taken a shower and was talking to a fellow inmate. Jauregui was running two pods that day, so he told the cleaning women to lock down early, around midnight. He also commented on a hole near the crotch of Ashley's pants. Ashley went to her cell.
70. Jauregui went to Ashley's cell a few minutes later and asked her to talk to him in the office. Ashley entered the pod office; it was dark. Jauregui yanked Ashley close to him. He placed his fingers in the hole in the crotch of Ashley's pants and ripped them open. Jauregui shoved his hand over Ashley's mouth and unzipped his pants. Jauregui then thrust Ashley around and bent her over. He raped Ashley.
71. Afterward, Ashley left the office and hurried to her cell. She sat there alone and cried. A few minutes later, Jauregui shined his light into Ashley's cell to ask if she was okay. She did not respond. When he walked by again, Ashley asked to take another shower. Jauregui opened the door. Later that evening, he called Ashley to the office to apologize...for raping her.
72. After two weeks, Jauregui returned, telling Ashley he loved her, and handed her a note in the presence of Defendant Acosta. Jauregui wrote Ashley multiple notes, including a note where he referred to already being with Ashley sexually, *i.e.*, the first time he raped her, and said he was finding excuses to see her. In another note, Jauregui writes that he opens her cell door. The PREA investigator has these notes. Ashley saved the pants from the evening of the first rape, but they were later taken during a search of her cell.
73. The facility became fully staffed over the next few months, so Jauregui moved back to work intake. Though he would have no business there, he made it a point to visit Ashley in her pod, usually between midnight and 3:00 a.m. while she was out cleaning. Jauregui told Ashley how other officers felt it was weird that he preferred her pod and that even though

his movements were being watched and he had been seen speaking with Ashley privately, he did not get in trouble. Jauregui was allowed to work there, go there, and switch assignments, both with and without permission, with no oversight or reports.

74. On or about February 12, 2023, Jauregui staffed the pod near Ashley's pod, Echo Charlie. He told Ashley that the warden asked him to work for that pod. Correctional officers Tenet and Pack allowed Ashley out of her cell because her trial was nearing. Although not assigned, Jauregui went to Ashley's pod.
75. While Tenet is at Intake and Pack was getting supplies, Jauregui demanded that Ashley get into the office. He entered the office, shoved his hand down Ashley's pants, and jammed his fingers into her vagina. Pack was approaching, so Jauregui stopped. Ashley was crying, terrified. Pack asked if she was okay. Jauregui responded that they were just talking about her trial. Ashley returned to her cell. Jauregui remained in Ashley's pod.
76. Ashley heard Jauregui scream, "Schardein!!!" Terrified, she returned to the office. Jauregui closed the door. He grabbed Ashley's head and forced her to her knees. Jauregui unzipped his pants and told Ashley to "open her mouth." Fearfully, she did. He grabbed the back of Ashley's head and forced his penis into her mouth, and continued forcing her to give him oral sex. Jauregui smacked Ashley on the face as he moaned and continually forced her mouth onto his penis.
77. Pack knocked on the door, opened it, and said, "What are you doing?" Jauregui said again, "We're just talking about trial." Two female correctional officers entered the pod as Ashley walked to her cell.
78. Jauregui once again called Ashley back into the office. Before anything happened, however, Pack walked in and said Ashley did not look so good, so they called the nurse. The nurse checked Ashley's blood pressure and realized it was dangerously elevated. Ashley tried to relax. As Pack tried to walk Ashley to her cell, she fainted and hit a table. The nurse was called again. Ashley decided then she would report Jauregui after her trial.
79. Ashley did not initially report Jauregui's rape because she was afraid he would interfere with her upcoming trial by telling her husband Billy what had happened and convincing him to go to trial without her. Ashley was also afraid of being transferred before her trial.
80. During the trial, Jauregui escorted Ashley as she prepared for the most fateful decision of her life. He taunted her with faint praise about how he loved her, telling her that she was gorgeous and that he could not wait for them to be together.
81. In March 2023, after the trial, Ashley called Captain Christian to report a rape. Christian walked her to the medical facility. Jauregui or Pack called the medical department to get information on Ashley's reporting.
82. In April 2023, Ashley was informed that her report of the rape had been substantiated after a PREA investigation and that Jauregui was no longer posted within her unit.
83. Jauregui was placed on administrative leave and resigned. He was not disciplined.
84. Ashley was told she would be provided with psychological counseling but never received any counseling.
85. Cimarron employees blamed Ashley for reporting Jauregui and getting him "fired," and began retaliating against her after she submitted her PREA report.
86. One week after filing her PREA report, Ashley lost her job as a cleaner. Ashley repeatedly asked for an explanation and filed grievances about losing her job. Eventually, Defendant Warden Dickerson found out she had lost her job and assured her that she would get her job back because Assistant Warden Phillips, who knew about the PREA report, had no grounds to fire her.
87. Two weeks after Ashley filed her PREA report, a "town hall meeting" was called. Defendant Warden Dickerson and Assistant Warden Phillips were both present during the meeting. During the meeting, correctional officers claimed that inmates were filing "fake reports" with PREA allegations and that the inmates needed to stop making these allegations because it was disrespectful to the officers. Correctional officers openly talked about "fake PREA reports" in front of her, alluding to her report against Jauregui being

“fake.” When Ashley spoke up about the officers’ comments, she was written up.

88. Correctional officers began writing her up for minor infractions. One time, a correctional officer wrote Ashley up for “being disrespectful.” The write-up was later dropped after another correctional officer said the claim was untrue.
89. Cimarron employees continued their retaliation against Ashley after she filed her first lawsuit against Jauregui.
90. After Ashley’s first lawsuit against Jauregui had been filed, a correctional officer, Crosby, searched and trashed Ashley’s cell. Crosby had initially brought her K9 to search the cell of a different inmate named Ashley, but when an investigator told Crosby that the inmate was the “wrong Ashley,” Crosby brought the K9 to Ashley Schardein’s cell, where it allegedly found contraband. Ashley was then placed in the SHU for approximately a week after Crosby claimed she found contraband in Ashley’s cell. Ashley filed a grievance but was told detainees are subject to searches at any time.
91. Ashley was not reassigned to a different pod even though other inmates in her assigned pod openly disliked her treated her poorly because they blamed her for getting Jauregui “fired.”

The Sexual Assaults of Ashton Mattingly

92. Defendant Captain William Christian was one of the most prolific predators at Cimarron. During his tenure of terror, he sexually assaulted several female inmates while lavishing them with gifts. For instance, an inmate reported that another inmate performed oral sex on Christian in exchange for a gold necklace and yet another inmate performed oral sex on him in exchange for favors.
93. In December 2022, he set sights on Plaintiff Ashton Mattingly. While Ashton was in the SHU, Christian would stop by her cell. He told her that if she “did things for him,” he would keep her “bean hole,” the slot on the cell door, open. When other officers would close it, Christian would radio them and tell them to keep it open. Because Ashton was desperate for it to be kept open while she was in the segregated cell, when Christian asked her to flash him her breasts, she did so. This happened on two occasions.
94. Like Defendant Jauregui with Ashley, Christian would find excuses to pull Ashton out of her cell and get her to come to the pod office. Christian repeated this scheme to assault Ashton several times. On more than one occasion, he sent another inmate to get Ashton and gifted them chocolate and candy for doing so.
95. Once in the office, Christian would touch Ashton inappropriately. This happened on three or four occasions. He also asked her to flash him in the office on one occasion.
96. On or around January 6, 2023, Christian escorted Ashton and Ashley Schardein for an alleged correctional purpose. However, while walking, he forced Ashton and Ashley into a room without cameras. Christian ordered Ashley serve as a lookout and forced Ashton into a corner.
97. Christian asked Ashton to “suck his dick,” to which she responded that she was gay. Christian then turned Ashton around, dropped his pants, and pulled her yellow uniform pants down as well. Ashton asked him to use a condom; he said he did not bring one. The obese Christian began raping Ashton, who says the few minutes of his stomach bouncing against her back while he raped her “felt like hours.”
98. Afterward, Christian was red and sweaty, which would not have occurred if he had merely done his job of escorting Ashton and Ashley. This was noticed by correctional officers McGill and Deshazer, but neither reported it. Ashton told Deshazer that Christian had propositioned her for oral sex but the allegation was disregarded.
99. Christian flaunted his illegal “relationship” with Ashton. He gave her Newport cigarettes, gum, soda, food, mascara, and nice pens from the free world. He would release Ashton from her cell and even from segregation to be with him. He even had officers bring her to the EC Pod office, make all the other officers leave, and sexually assault Ashton. None of the correctional officers ever reported him.

100. In fact, correctional officers made disrespectful comments towards Ashton about her sexual assaults, including one captain commenting that she would be “safe” when Defendant Christian was not on duty.
101. Ashton reported Christian’s inappropriate behavior one month after the January 6, 2023 assault, but not in full, and Ashton denied the full extent of the sexual assault because she was fearful of retaliation, such as being placed into segregation and having her phone privileges taken away.
102. Christian would constantly threaten to put Ashton in segregation if she refused his commands. He would ask, “Do you want to go back to ‘seg’ and be stuck in there and can’t talk to your family?” He also told her that if she reported him, she would be put back in segregation.
103. On February 9, 2023, the warden was informed that Ashton had made PREA allegations to the U.S. Marshal Services. Ashton reported that Christian escorted Ashton and Ashley to the unit property room where he exposed his penis and propositioned her for oral sex in exchange for contraband.
104. The day after Ashton told her attorney about the assaults via Zoom, she was placed in the SHU. The next day, she was taken into Unit Manager Boone’s office for her PREA interview and told him and other employees who were present about Christian’s behavior.
105. Ashton’s PREA interview was grossly inadequate, biased, and designed to protect the prison. Major Gibson, Correctional Officer Davis, and Sergeant Adams were present for the PREA interview. Davis shared what Ashton had disclosed during her interview with other people in the facility.
106. Soon afterward, Ashton was moved to another facility briefly, but she was returned to Cimarron for a short time. When she was initially transferred from Cimarron, the employees at Cimarron did not provide her with any of her personal belongings.
107. When Ashton was brought back to Cimarron in the summer of 2024, a correctional officer informed her that Christian was a “dirty dog” and that Ashton was not his only victim.
108. Like Ashley, Ashton was housed with inmates who openly disliked her treated her poorly because they blamed her for getting Christian “fired.” They were upset because they could no longer get cigarettes and other items from Christian.
109. And, like Ashley, Cimarron employees blamed Ashton for reporting Christian and getting him and other correctional officers “fired,” and began retaliating against her.
110. Correctional officer Davis placed Ashton in an unsanitary cell with an overflowing toilet, assigned her a cellmate who was known to be difficult, let her out of her cell last after everyone else had already been let out, and told other correctional officers that Ashton was the reason Deshazer and McGill were no longer working at Cimarron.
111. Ashton was later transferred to another facility but brought back to Cimarron again in the summer of 2025 for about six weeks. During that time, Davis asked whether Ashton was a victim of sexual assault during the investigation, to which Ashton replied, “Yes,” but Davis said, “Okay, so no” and wrote “no” on the form even though Davis was very familiar with Ashton’s previous PREA report against Christian. Ashton did not speak up out of fear of being put in the SHU.
112. Unit Manager Gibson commented that he “wanted tickets to the show,” referring to Ashton flashing Christian.
113. Ashton was traumatized by repeatedly being sent back to the same facility where CoreCivic employees allowed her to be assaulted and raped by Christian and other inmates were upset with her because Christian and other officers who had engaged in misconduct no longer worked at the facility.

The Sexual Assaults of Sydney Sisk

114. In 2022 and 2023, Defendant Dill would ask Plaintiff Sydney Sisk to flash him her breasts in exchange for tobacco pouches. Defendant Dill would order Sydney and several other inmates to flash him multiple times a day.

115. It was well-known amongst inmates at Cimarron that Defendant Acosta was a “predator” and a “creep,” but whenever inmates tried to defend each other, they would be placed in segregation. Acosta was known for giving snacks to inmates who he was pursuing for sexual relationships.
116. Sometime after Sydney arrived at Cimarron, Defendant Acosta approached her to speak with her, claiming she looked familiar even though she had never met him before.
117. Acosta gave Sydney preferential treatment. Once, she was in a fight with her cellmate. Acosta did not follow any procedures. He did not document the fight nor discipline Sydney in any way, such as segregation (the usual protocol). He simply moved Sydney to another cell. No correctional officer inquired about or reported the obvious lack of procedure and protocol.
118. Sydney would accompany other inmates to offices in the pod to see Acosta. Sydney and another inmate, Stormy, would go to Acosta’s office to get candy and he would offer them sips from his energy drink.
119. After Stormy left Cimarron, Acosta would look for Sydney and try to make eye contact whenever he was in the unit. When Sydney would go to the office with Acosta, he would give her “anything she wanted,” including things from other correctional officers’ offices and desks.
120. On March 2, 2023, when Sydney and another inmate, Meredith Stotsky, went to Acosta’s office so Meredith could file a PREA report against another correctional officer for inappropriately touching her during a pat down, ironically, Acosta saw his chance.
121. Acosta played music on his computer for Sydney and Meredith and allowed Sydney to walk around the office and open drawers.
122. Acosta kissed Sydney, touched her hands, and rubbed her feet. Acosta then patted his lap for Sydney to sit on it and shoved his fingers into her vagina. He then received a call code and left Sydney and Meredith in the hallway outside of the office for several minutes, where they were in full view of inmates waiting in line for pill call.
123. Upon Acosta’s return, he let Sydney and Meredith back into the office, where they remained for at least another hour. He gave Sydney a lollipop and Meredith office supplies and asked them each to give him a hug. He advised Sydney to write down what happened to Meredith during the alleged PREA incident, and said he would be by her cell later. Meredith and Sydney left.
124. After several hours, Acosta returned to Sydney’s cell, retrieved Sydney’s statement in relation to Meredith’s PREA report, kissed Sydney, and commented that he and Sydney would have sex on Monday. He also asked Meredith to show him her breasts, claiming that he needed to see where the other correctional officer had touched her, to which she complied.
125. An investigation into Acosta was opened the next day after two correctional officers noticed items were missing from their desks in the office and reviewed the prior day’s video footage. Unit Manager Boone and Sergeant Adams called the local police. Boone commented that they finally “got” Acosta, indicating that CoreCivic employees were aware of Acosta’s prior misconduct.
126. Defendant Warden Dickerson, who had previously joked around with Sydney and jokingly called her “trouble,” looked at Sydney differently and made a face at her after learning about what had happened.
127. Sydney and Meredith were immediately separated, with Meredith being taken to medical and the rest of the unit being placed on lockdown. After a weekend on lockdown, Meredith was transferred to another facility on Monday and Sydney was transferred to another facility on Tuesday.
128. Acosta was terminated prior to the completion of the internal investigation. He received a “problem-solving notice” but was not disciplined.
129. Like Ashton, Sydney was later transferred back to Cimarron. Sydney was housed at Cimarron for a few weeks in October 2025.

CAUSES OF ACTION

COUNT 1

Sex trafficking in violation of 18 U.S.C. § 1591(a)(1) against Defendants Trey Dill, Damian Jauregui, William Christian, and Reuben Accosta.

130. Defendant Jauregui engaged or attempted to engage in sex trafficking of Plaintiff Ashley Schardein as prohibited under 18 U.S.C. § 1591 and § 1594(a) by forcing her to engage in commercial sex acts, including raping her, sexually assaulting her, and kissing her.
131. Defendant Jauregui knowingly recruited, enticed, and solicited Ashley by making repeated romantic overtures, flirting, and harassing her, and offering special benefits and things of value for sex acts such as toiletry and personal hygiene items.
132. Defendant Jauregui made Ashley commit these sexual acts through force, fraud, or coercion within the meaning of 18 U.S.C. § 1591. He did so by:
 - a. Using physical force to engage in multiple sexual acts;
 - b. Assaulting her in places where she could not easily escape;
 - c. Using his power and status as a correctional officer who has the power to control and direct incarcerated persons and their movements to have Ashley engage in commercial sexual acts with him.
133. These methods of force, fraud, and coercion were a plan designed to make Ashley believe that she would suffer serious harm should she not obey his sexual advances.
134. These tactics are part of a well-known scheme, plan, or pattern at Cimarron by a network of officers that were intended to cause a person to believe that failure to perform an act would result in serious harm or physical restraint, such as write ups, administrative punishments, and loss of job privileges and out-of-cell privileges.
135. Defendant Jauregui exchanged valuable goods and special benefits for these sex acts. In this way, Defendant Jauregui's conduct constitutes an attempt to engage in sex in exchange for things of value, the definition of commerciality under 18 U.S.C. § 1591.
136. These acts constitute civil wrongs inflicted on Plaintiff and actionable under 18 U.S.C. § 1595.
137. Defendant's conduct has caused Plaintiff serious harm including, without limitation, physical, psychological, emotional, financial, and reputational harm and she has a claim for damages for such violations under 18 U.S.C. § 1591, 18 U.S.C. § 1595.
138. Defendant's conduct warrants the Court's imposition of compensatory and punitive damages against the Defendants.
139. Pursuant to 18 U.S.C. § 1595, Plaintiff is entitled to recover damages and reasonable attorneys' fees for the Defendants' wrongful conduct.
140. Defendant Christian engaged or attempted to engage in sex trafficking of Plaintiff Ashton Mattingly as prohibited under 18 U.S.C. § 1591 and § 1594(a) by forcing her to engage in commercial sex acts, including raping her, groping her, and forcing her to flash him her breasts, and asking her to perform oral sex on him.
141. Defendant Christian knowingly recruited, enticed, and solicited Ashton by making repeated sexual overtures, flirting, and harassing her, and threatening to withhold benefits and things of value for sex acts, such as being let out of segregation.
142. Defendant Christian forced Ashton to commit these sexual acts through force, fraud, or coercion within the meaning of 18 U.S.C. § 1591. He did so by:
 - a. Using physical force to engage in multiple sexual acts;
 - b. Assaulting her in a place where she could not easily escape
 - c. Using his power and status as a correctional officer who has the power to control and direct incarcerated persons and their movements to have Ashton engage in

commercial sexual acts with him;

143. These methods of force, fraud, and coercion were a plan designed to make Ashton believe that she would suffer serious harm should she not obey his sexual advances.
144. These tactics are part of a well-known scheme, plan, or pattern at Cimarron by a network of officers that were intended to cause a person to believe that failure to perform an act would result in serious harm or physical restraint.
145. Defendant Christian exchanged valuable goods and special benefits for these sex acts. In this way, Defendant Christian's conduct constitutes an attempt to engage in sex in exchange for things of value, the definition of commerciality under 18 U.S.C. § 1591.
146. These acts constitute civil wrongs inflicted on Plaintiff and actionable under 18 U.S.C. § 1595.
147. Defendant's conduct has caused Plaintiff serious harm including, without limitation, physical, psychological, emotional, financial, and reputational harm and she has a claim for damages for such violations under 18 U.S.C. § 1591, 18 U.S.C. § 1595.
148. Defendant's conduct warrants the Court's imposition of compensatory and punitive damages against the Defendants.
149. Pursuant to 18 U.S.C. § 1595, Plaintiff is entitled to recover damages and reasonable attorneys' fees for the Defendants' wrongful conduct.
150. Defendant Acosta engaged or attempted to engage in sex trafficking of Sydney Sisk as prohibited under 18 U.S.C. § 1591 and § 1594(a) by forcing her to engage in commercial sex acts, including sexually assaulting her while another inmate was reporting a PREA violation and kissing and hugging her.
151. Defendant Acosta knowingly recruited, enticed, and solicited Sydney by making repeated romantic overtures, flirting, and harassing her, and offering special benefits and things of value for sex acts, such as candy.
152. Defendant Acosta made Sydney commit these sexual acts through force, fraud, or coercion within the meaning of 18 U.S.C. § 1591. He did so by:
 - a. Using physical force to engage in a sexual act;
 - b. Assaulting her in a place where she could not easily escape;
 - c. Using his power and status as a correctional officer who has the power to control and direct incarcerated persons and their movements to have Sydney engage in commercial sexual acts with him;
153. These methods of force, fraud, and coercion were a plan designed to make Sydney believe that she would suffer serious harm should she not obey his sexual advances.
154. These tactics are part of a well-known scheme, plan, or pattern at Cimarron by a network of officers that were intended to cause a person to believe that failure to perform an act would result in serious harm or physical restraint.
155. Defendant Acosta exchanged valuable goods and special benefits for these sex acts. In this way, Defendant Acosta conduct constitutes an attempt to engage in sex in exchange for things of value, the definition of commerciality under 18 U.S.C. § 1591.
156. These acts constitute civil wrongs inflicted on Plaintiff and actionable under 18 U.S.C. § 1595.

157. Defendant's conduct has caused Plaintiff serious harm including, without limitation, physical, psychological, emotional, financial, and reputational harm and she has a claim for damages for such violations under 18 U.S.C. § 1591, 18 U.S.C. § 1595.
158. Defendant's conduct warrants the Court's imposition of compensatory and punitive damages against the Defendants.
159. Pursuant to 18 U.S.C. § 1595, Plaintiff is entitled to recover damages and reasonable attorneys' fees for the Defendants' wrongful conduct.

COUNT 2

Sex Trafficking in violation of 18 U.S.C. § 1591(a)(2) against Defendants Dickerson and CoreCivic.

160. At all relevant times, Defendant officers Dill, Jauregui, Christian, and Acosta were employed by and agents of CoreCivic.
161. At all relevant times, Defendant officers were acting on behalf of and furtherance of CoreCivic.
162. CoreCivic, through its operation of Cimarron, and employment of both the Defendant officers and officers who assisted in their illegal scheme, knowingly benefited from Defendant Officers' conduct in violation of 18 U.S.C. 1591(a)(2) and permitted or otherwise acquiesced to it.
163. CoreCivic benefitted from the continued employment of the Defendant officers and the officers who assisted in their illegal scheme.
164. CoreCivic benefitted from its continuing business relationships with the U.S. Marshal Service and Immigration and Customs Enforcement to house inmates.
165. CoreCivic ignored obvious signs that correctional officers were engaged in sex trafficking and failed to take adequate steps to properly investigate allegations of sexual assault, discipline correctional officers, or train staff on intervening in sexual assault and reporting sexual assault in order to prevent the occurrence of sex trafficking.
166. Defendant Dickerson benefitted from the continued employment of the Defendant officers and the officers who assisted in their illegal scheme, particularly in light of chronic understaffing at Cimarron.
167. Defendant Dickerson ignored obvious signs that correctional officers were engaged in sex trafficking and failed to take adequate steps to properly investigate allegations of sexual assault, discipline correctional officers, or train staff on intervening in sexual assault and reporting sexual assault in order to prevent the occurrence of sex trafficking.

COUNT 3

Forced Labor in violation of 18 U.S.C. § 1589 against Defendants Trey Dill, Damian Jauregui, William Christian, and Reuben Accosta.

168. Defendants obtained or attempted to obtain the forced labor of Plaintiffs as prohibited under 18 U.S.C. § 1589. Defendants knowingly forced Plaintiffs to perform sex acts, including oral and penetrative sex, and other sexual acts, constituting labor or services under 18 U.S.C. § 1589. *See* Count 1.
169. In exchange for this forced work, Defendants paid Plaintiffs with basic necessities and special benefits.
170. Defendants made Plaintiffs commit labor by force, restraint, or abuse of law or

process within the meaning of 18 U.S.C. § 1589, including:

- a. Forcing Plaintiffs to perform these acts in areas where they could not easily escape;
 - b. Using their power and status as correctional officers who had the power to control and direct incarcerated persons and their movements, control access to disciplinary records, and conduct searches, in order facilitate sexual acts;
 - c. Threatening abuse of process in the form of disciplinary actions—including solitary confinement— if they did not perform this labor;
 - d. Restricting access to basic necessities if they did not perform this labor.
171. Defendants forced Plaintiffs into performing this service by a scheme, plan, or pattern of retaliatory actions that was intended to cause Plaintiffs to believe that if they did not perform such services, they would suffer serious harm or physical restraint.
172. These tactics are part of a well-known scheme, plan, or pattern at Cimarron by a network of officers that was intended to cause a person to believe that failure to perform labor would result in serious harm or physical restraint against any person.
173. These acts constitute civil wrongs inflicted on Plaintiff and are actionable under 18 U.S.C. § 1595.
174. Defendants' conduct has caused Plaintiffs serious harm including, without limitation, physical, psychological, emotional, financial, and reputational harm, and they have a claim for damages for such violations under 18 U.S.C. § 1589 and § 1595.
175. Defendants' conduct warrants the Court's imposition of punitive damages against the Defendants.
176. Pursuant to 18 U.S.C. § 1595, Plaintiffs are entitled to recover damages and reasonable attorneys' fees for the Defendants' wrongful conduct.

COUNT 4

Forced Labor in violation of 18 U.S.C. § 1589(b) against Defendants Dickerson and CoreCivic.

177. At all relevant times, Defendant officers Dill, Jauregui, Christian, and Acosta were employed by and agents of CoreCivic.
178. At all relevant times, Defendant officers were acting on behalf of and furtherance of CoreCivic.
179. CoreCivic, through its operation of Cimarron, and employment of both the Defendant officers and officers who assisted in their illegal scheme, knowingly benefited from Defendant Officers' conduct in violation of 18 USC 1589(b) and permitted or otherwise acquiesced to it.
180. CoreCivic benefitted from the continued employment of the Defendant officers and the officers who assisted in their illegal scheme.
181. CoreCivic benefitted from its continuing business relationships with the U.S. Marshal Service and Immigration and Customs Enforcement to house inmates.
182. CoreCivic knew or recklessly disregarded the fact that correctional officers were engaged in forced sexual labor and failed to take adequate steps to expose the abuses and tacitly approved of the conduct by failing to properly investigate allegations of sexual assault, discipline correctional officers, or train staff on intervening in sexual assault and reporting sexual assault.
183. Defendant Dickerson benefitted from the continued employment of the Defendant officers and the officers who assisted in their illegal scheme, particularly in light of chronic understaffing at Cimarron.
184. Defendant Dickerson ignored evidence of sexual relationships between employees and inmates despite seeing inmates with contraband that could only have been brought into the facility by employees.
185. Defendant Dickerson knew or recklessly disregarded the fact that correctional officers were engaged in forced sexual labor and failed to take adequate steps to expose the abuses and tacitly approved of the conduct by failing to properly investigate allegations of sexual assault, discipline correctional officers, or train staff on intervening in sexual assault and reporting sexual assault.

COUNT 5

Obstruction to prevent the enforcement of 18 U.S.C. § 1591 against all Defendants.

186. Defendants, together and individually, obstructed or attempted to obstruct enforcement efforts or investigations into the sex trafficking of Plaintiffs under 18 U.S.C. § 1591(d) and § 1592.
187. Their tactics were part of a well-known scheme, plan, or pattern at Cimarron by a network of officers that were intended to cause a person to believe that reporting would result in serious harm or physical restraint.
188. Defendants Jauregui, Christian, and Acosta discouraged Plaintiffs from reporting sexual assaults and sexual harassment by threatening them with placement in the SHU, or loss of other privileges, or promising them goods and benefits in exchange for their silence, delaying their PREA reports and internal investigations.
189. Defendant Dickerson was present during a “town hall” meeting in which correctional officers discouraged inmates from filing PREA reports.
190. CoreCivic employees delayed Plaintiffs from timely reporting sexual assault and sexual harassment, discouraged Plaintiffs and other inmates from filing PREA reports by punishing Plaintiffs for reporting, isolated Plaintiffs after they reported by transferring them to different facilities or placing them in the SHU, gossiped and commented on inmates’ sexual assault and sexual harassment, transferred Plaintiffs back to Cimarron where they had experienced sexual abuse and faced retaliation from correctional officers and inmates for reporting, and retaliated against Plaintiff Ashley for filing a lawsuit.
191. Ashton reported Defendant Christian’s request for oral sex to CoreCivic employees Gibson, Boone, Adams, and Davis but they did not all take the allegations seriously.
192. Correctional officers McGill and Deshazer were on duty and commented on Defendant Christian being “red and sweaty” after he raped Ashton but failed to report the rape.
193. Correctional officers gossiped and made jokes and comments about inmates being sexually assaulted, including comments about Defendant Christian raping Ashton, instead of reporting the sexual assaults.
194. When inmates tried to defend each other from correctional officers’ assaults, they would be placed in the SHU.
195. Defendant Dickerson ignored evidence of sexual relationships between employees and inmates despite seeing inmates with contraband that could only have been brought into the facility by employees.
196. Defendant Dickerson failed to investigate which correctional officers brought in contraband even though doing so would have revealed which officers were engaged in forced sexual acts with inmates in exchange for goods and benefits.
197. Defendant CoreCivic failed to properly investigate or discipline correctional officers for their sexual assaults of inmates and failed to take any action to address the rampant sexual abuse occurring in the facility despite receiving reports and complaints from multiple inmates against multiple correctional officers.
198. Defendant CoreCivic failed to report employee sexual assault and sexual harassment to local law enforcement, preventing external investigations that could lead to prosecutions in an effort to protect employees from prosecution.
199. These acts constitute civil wrongs inflicted on Plaintiffs and are actionable under 18 U.S.C. § 1595.
200. Defendants’ conduct has caused Plaintiffs serious harm including, without limitation, physical, psychological, emotional, financial, and reputational harm, and they have a claim for damages for such violations under 18 U.S.C. § 1591, 18 U.S.C. § 1592, 18 U.S.C. § 1595.
201. Defendants’ conduct warrants the Court’s imposition of compensatory and punitive

damages against the Defendants.

202. Pursuant to 18 U.S.C. § 1595, Plaintiffs are entitled to recover damages and reasonable attorneys' fees for the Defendants' wrongful conduct.

COUNT 6

Retaliation in violation of the First Amendment against Defendant CoreCivic.

203. Defendant CoreCivic cultivated and continues to maintain a culture at Cimarron in which employees regularly threaten inmates to prevent them from reporting sexual assault and sexual harassment and retaliate against inmates for reporting sexual assault and sexual harassment.
204. CoreCivic employees delayed Plaintiffs from timely reporting sexual assault and sexual harassment, discouraged Plaintiffs and other inmates from filing PREA reports by punishing Plaintiffs for reporting, isolated Plaintiffs after they reported by transferring them to different facilities or placing them in the SHU, gossiped and commented on inmates' sexual assault and sexual harassment, transferred Plaintiffs back to Cimarron where they had experienced sexual abuse and faced retaliation from correctional officers and inmates for reporting, and retaliated against Plaintiff Ashley for filing a lawsuit.
205. Inmates refrain from reporting sexual assault and sexual harassment for fear of retaliation.
206. Ashley delayed reporting Defendant Jauregui's sexual assault and harassment because she was afraid of being transferred to another facility before her trial.
207. Ashton delayed reporting Defendant Christian's sexual assault because she was afraid of being put in the SHU.
208. When Davis denied that Ashton had been a victim of a PREA violation, Ashton did not speak up out of fear of being put in the SHU.
209. CoreCivic employees retaliated against inmates who reported sexual assault and sexual harassment by placing them in the SHU or transferring them to other facilities.
210. After Ashton told her attorney about the sexual assaults, she was placed in the SHU.
211. After Ashton reported Defendant Christian's sexual assault and was transferred to another facility, correctional officers did not provide her with any of her personal belongings.
212. After an investigation was opened into Defendant Acosta, Sydney was immediately separated from Meredith and the two remained separated over the weekend until they were transferred to different facilities.
213. CoreCivic employees punished inmates who reported sexual assault and sexual harassment.
214. One week after filing her PREA report, Ashley lost her job as a cleaner. When Ashley's grievances reached Defendant Warden Dickerson, he reinstated her position and acknowledged that there were no grounds for Assistant Warden Phillips to fire her.
215. After Ashley reported Defendant Jauregui's sexual assault, correctional officers began writing her up for minor infractions. Correctional officers also began writing Ashley up for fabricated infractions, including a write-up for "being disrespectful" that was later dropped because it was untrue.
216. After Ashton returned to Cimarron in 2024, correctional officer Davis placed Ashton in an unsanitary cell with an overflowing toilet, assigned her a cellmate who was known to be difficult, let her out of her cell last after everyone else had already been let out, and told other correctional officers that Ashton was the reason Deshazer and McGill were no longer working at Cimarron.
217. CoreCivic employees who received reports of sexual assault and sexual harassment commented on PREA reports in front of other inmates and discouraged inmates from filing PREA reports.
218. During a "town hall" meeting convened two weeks after Ashley submitted her PREA report, correctional officers claimed that inmates were filing "fake reports" with PREA

allegations and that the inmates needed to stop making these allegations because it was disrespectful to the officers. Correctional officers openly talked about “fake PREA reports” in an effort to discourage inmates from filing reports. Both Defendant Dickerson—the warden at the time—and Assistant Warden Phillips were present for the comments at the “town hall.”

219. CoreCivic employees denied and dismissed inmates’ allegations of sexual assault and gossiped about their sexual assaults.
220. When Ashton was transferred back to Cimarron in 2024, a correctional officer approvingly commented on Defendant Christian being a “dirty dog” and having other victims.
221. When Ashton was transferred back to Cimarron in 2025, Davis asked whether Ashton was a victim of sexual assault. When Ashton replied, “Yes,” Davis said, “Okay, so no” and wrote “no” on the form even though Davis was very familiar with Ashton’s previous PREA report against Christian.
222. A correctional officer commented to Ashton that he wanted “tickets to the show,” referring to Defendant Christian forcing her to flash him her breasts.
223. CoreCivic employees retaliated against inmates for filing lawsuits alleging sexual assault against CoreCivic employees.
224. After Ashley’s first lawsuit against Defendant Jauregui had been filed, a correctional officer, Crosby, searched and trashed Ashley’s cell. Crosby had initially brought her K9 to search the cell of a different inmate named Ashley, but when an investigator told Crosby that the inmate was the “wrong Ashley,” Crosby brought the K9 to Ashley Schardein’s cell, where it allegedly found contraband. Ashley was placed in the SHU for approximately a week for the alleged contraband.
225. CoreCivic employees allowed inmates who had reported being sexually assaulted or sexually harassed by employees to be transferred back to Cimarron and housed with inmates who blamed them for employees no longer working at the facility.
226. Ashley was forced to remain in her assigned pod even though other inmates openly disliked her treated her poorly because they blamed her for getting Defendant Jauregui “fired.”
227. Ashton was repeatedly sent back to Cimarron where other inmates were openly upset with her because Defendant Christian no longer worked at the facility.
228. Sydney was transferred back to Cimarron after she had been moved to another facility.
229. Plaintiffs remain in federal custody and could be transferred back to Cimarron, especially because Cimarron is the facility where federal inmates are housed if they appear in court in Oklahoma for any post-conviction hearings.
230. Defendant CoreCivic failed to properly investigate or discipline correctional officers for retaliating against Plaintiffs for reporting sexual assault and sexual harassment and filing a lawsuit detailing sexual assault despite.
231. On information and belief, Defendant CoreCivic has not changed its practices related to retaliating against inmates who report sexual assault or sexual harassment.
232. Plaintiffs’ reporting of PREA violations and Plaintiff Ashley’s filing of her first lawsuit were the cause of Defendant CoreCivic’s employees’ adverse actions.
233. These actions constitute civil wrongs inflicted on Plaintiffs and are actionable under 42 U.S.C. § 1983.
234. Defendants’ conduct has caused Plaintiffs serious harm including, without limitation, physical, psychological, emotional, financial, and reputational harm, and they have a claim for injunctive relief enjoining Defendant CoreCivic from transferring them back to Cimarron where they will face further retaliation or interfering with their First Amendment right to report misconduct.

PRAYER FOR RELIEF

235. An award of compensatory, punitive, and nominal damages to each named Plaintiff

in an amount to be determined at trial;

- 236. An award to Plaintiffs of the costs of this suit and reasonable attorneys' fees and litigation expenses;
- 237. Injunctive relief;
- 238. For such other and further relief as this Court may deem just and proper.

Respectfully submitted,

/s/ Ronald Jones II

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