



October 13, 2026

VIA FEDEX AND EMAIL

Office of the General Counsel U.S. Department of Homeland Security
245 Murray Lane, SW
Mailstop 0485
Washington, DC 20528-0485
ogc@hq.dhs.gov

U.S. Citizenship and Immigration Services
Office of the Chief Counsel
111 Massachusetts Avenue, NW
Washington, DC 20529-2260

Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
500 12th Street, SW
Washington, DC 20536-5902

U.S. Department of Health and Human Services
Office of the General Counsel
200 Independence Avenue, SW
Washington, DC 20201

Re: Claims for Damages under the Federal Tort Claims Act on behalf of Yovana Lopez Medina

The National Police Accountability Project and Jones Law Firm represent Ms. Yovana Lopez Medina ("Claimant"). Enclosed please find administrative claims we are filing on her behalf under the Federal Tort Claims Act. The claims consist of: (1) a Claim Authorization Form; (2) a Standard Form 95; and (3) an Attachment to the Standard Form 95 detailing the basis of her claims.

Sincerely,

Keisha James
National Police Accountability Project



AUTHORIZATION OF REPRESENTATION

I, Yovana Lopez Medina, state the following with regard to the attached administrative complaint form:

1. I have retained the following attorneys to represent me with regard to the referenced tort claim:

Ronald Jones II, OBA No. 33754
The Jones Firm, PLLC
512 NW 12th Street
Oklahoma City, OK 73103
Telephone: 405.930.4209

Lauren Bonds
Keisha James
Breanta Boss
Eliana Machefsky
National Police Accountability Project
1403 Southwest Blvd.
Kansas City, KS 66103
Telephone: (504) 220-0401

2. I hereby authorize the above attorneys to serve as my legal representative for the purposes of this administrative claim and intend for this document to serve as proof of my authority for the above attorneys to serve in this role under 28 CFR 14.2 (a).

Yovana Lopez Medina

August 19, 2026

CLAIM FOR DAMAGE, INJURY, OR DEATH

INSTRUCTIONS: Please read carefully the instructions on the reverse side and supply information requested on both sides of this form. Use additional sheet(s) if necessary. See reverse side for additional instructions.

FORM APPROVED
OMB NO. 1105-0008

1. Submit to Appropriate Federal Agency:

U.S. Department of Homeland Security
Office of the General Counsel
2707 Martin Luther King Jr. Ave. SE

2. Name, address of claimant, and claimant's personal representative if any.
(See instructions on reverse). Number, Street, City, State and Zip code.



3. TYPE OF EMPLOYMENT

4. DATE OF BIRTH

5. MARITAL STATUS

6. DATE AND DAY OF ACCIDENT

7. TIME (A.M. OR P.M.)

☐ MILITARY ☒ CIVILIAN

02/26/93

Married

[see attached]

A.M. and P.M.

8. BASIS OF CLAIM (State in detail the known facts and circumstances attending the damage, injury, or death, identifying persons and property involved, the place of occurrence and the cause thereof. Use additional pages if necessary).

[see attached]

9.

PROPERTY DAMAGE

NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, Street, City, State, and Zip Code).

BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF THE DAMAGE AND THE LOCATION OF WHERE THE PROPERTY MAY BE INSPECTED.
(See instructions on reverse side).

10.

PERSONAL INJURY/WRONGFUL DEATH

STATE THE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM. IF OTHER THAN CLAIMANT, STATE THE NAME OF THE INJURED PERSON OR DECEDENT.

[see attached]

11.

WITNESSES

NAME

ADDRESS (Number, Street, City, State, and Zip Code)

[see attached]

12. (See instructions on reverse).

AMOUNT OF CLAIM (in dollars)

12a. PROPERTY DAMAGE

12b. PERSONAL INJURY

12c. WRONGFUL DEATH

12d. TOTAL (Failure to specify may cause forfeiture of your rights).

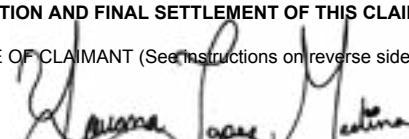
\$1 Million

\$1 Million

I CERTIFY THAT THE AMOUNT OF CLAIM COVERS ONLY DAMAGES AND INJURIES CAUSED BY THE INCIDENT ABOVE AND AGREE TO ACCEPT SAID AMOUNT IN FULL SATISFACTION AND FINAL SETTLEMENT OF THIS CLAIM.

13a. SIGNATURE OF CLAIMANT (See instructions on reverse side).

13b. PHONE NUMBER OF PERSON SIGNING FORM 14. DATE OF SIGNATURE


CIVIL PENALTY FOR PRESENTING
FRAUDULENT CLAIM



10/12/2026

CRIMINAL PENALTY FOR PRESENTING FRAUDULENT
CLAIM OR MAKING FALSE STATEMENTS

The claimant is liable to the United States Government for a civil penalty of not less than \$5,000 and not more than \$10,000, plus 3 times the amount of damages sustained by the Government. (See 31 U.S.C. 3729).

Fine, imprisonment, or both. (See 18 U.S.C. 287, 1001.)

INSURANCE COVERAGE

In order that subrogation claims may be adjudicated, it is essential that the claimant provide the following information regarding the insurance coverage of the vehicle or property.

15. Do you carry accident Insurance? ☐ Yes If yes, give name and address of insurance company (Number, Street, City, State, and Zip Code) and policy number. ☒ No

16. Have you filed a claim with your insurance carrier in this instance, and if so, is it full coverage or deductible? ☐ Yes ☒ No

17. If deductible, state amount.

N/A

18. If a claim has been filed with your carrier, what action has your insurer taken or proposed to take with reference to your claim? (It is necessary that you ascertain these facts).

N/A

19. Do you carry public liability and property damage insurance? ☐ Yes If yes, give name and address of insurance carrier (Number, Street, City, State, and Zip Code). ☒ No

INSTRUCTIONS

Claims presented under the Federal Tort Claims Act should be submitted directly to the "appropriate Federal agency" whose employee(s) was involved in the incident. If the incident involves more than one claimant, each claimant should submit a separate claim form.

Complete all items - Insert the word NONE where applicable.

A CLAIM SHALL BE DEEMED TO HAVE BEEN PRESENTED WHEN A FEDERAL AGENCY RECEIVES FROM A CLAIMANT, HIS DULY AUTHORIZED AGENT, OR LEGAL REPRESENTATIVE, AN EXECUTED STANDARD FORM 95 OR OTHER WRITTEN NOTIFICATION OF AN INCIDENT, ACCOMPANIED BY A CLAIM FOR MONEY

Failure to completely execute this form or to supply the requested material within two years from the date the claim accrued may render your claim invalid. A claim is deemed presented when it is received by the appropriate agency, not when it is mailed.

If instruction is needed in completing this form, the agency listed in item #1 on the reverse side may be contacted. Complete regulations pertaining to claims asserted under the Federal Tort Claims Act can be found in Title 28, Code of Federal Regulations, Part 14. Many agencies have published supplementing regulations. If more than one agency is involved, please state each agency.

The claim may be filled by a duly authorized agent or other legal representative, provided evidence satisfactory to the Government is submitted with the claim establishing express authority to act for the claimant. A claim presented by an agent or legal representative must be presented in the name of the claimant. If the claim is signed by the agent or legal representative, it must show the title or legal capacity of the person signing and be accompanied by evidence of his/her authority to present a claim on behalf of the claimant as agent, executor, administrator, parent, guardian or other representative.

If claimant intends to file for both personal injury and property damage, the amount for each must be shown in item number 12 of this form.

DAMAGES IN A **SUM CERTAIN** FOR INJURY TO OR LOSS OF PROPERTY, PERSONAL INJURY, OR DEATH ALLEGED TO HAVE OCCURRED BY REASON OF THE INCIDENT. THE CLAIM MUST BE PRESENTED TO THE APPROPRIATE FEDERAL AGENCY WITHIN **TWO YEARS** AFTER THE CLAIM ACCRUES.

The amount claimed should be substantiated by competent evidence as follows:

(a) In support of the claim for personal injury or death, the claimant should submit a written report by the attending physician, showing the nature and extent of the injury, the nature and extent of treatment, the degree of permanent disability, if any, the prognosis, and the period of hospitalization, or incapacitation, attaching itemized bills for medical, hospital, or burial expenses actually incurred.

(b) In support of claims for damage to property, which has been or can be economically repaired, the claimant should submit at least two itemized signed statements or estimates by reliable, disinterested concerns, or, if payment has been made, the itemized signed receipts evidencing payment.

(c) In support of claims for damage to property which is not economically repairable, or if the property is lost or destroyed, the claimant should submit statements as to the original cost of the property, the date of purchase, and the value of the property, both before and after the accident. Such statements should be by disinterested competent persons, preferably reputable dealers or officials familiar with the type of property damaged, or by two or more competitive bidders, and should be certified as being just and correct.

(d) Failure to specify a sum certain will render your claim invalid and may result in forfeiture of your rights.

PRIVACY ACT NOTICE

This Notice is provided in accordance with the Privacy Act, 5 U.S.C. 552a(e)(3), and concerns the information requested in the letter to which this Notice is attached.

A. **Authority:** The requested information is solicited pursuant to one or more of the following: 5 U.S.C. 301, 28 U.S.C. 501 et seq., 28 U.S.C. 2671 et seq., 28 C.F.R. Part 14.

B. **Principal Purpose:** The information requested is to be used in evaluating claims.

C. **Routine Use:** See the Notices of Systems of Records for the agency to whom you are submitting this form for this information.

D. **Effect of Failure to Respond:** Disclosure is voluntary. However, failure to supply the requested information or to execute the form may render your claim "invalid."

PAPERWORK REDUCTION ACT NOTICE

This notice is solely for the purpose of the Paperwork Reduction Act, 44 U.S.C. 3501. Public reporting burden for this collection of information is estimated to average 6 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Director, Torts Branch, Attention: Paperwork Reduction Staff, Civil Division, U.S. Department of Justice, Washington, DC 20530 or to the Office of Management and Budget. Do not mail completed form(s) to these addresses.



Basis of Claim (Question 8)

Yovana Lopez Medina is a thirty-three year old immigration attorney who lives in Oklahoma City, OK. Ms. Medina is originally from Jalisco, Mexico and became a United States citizen in 2022, the same year that she graduated from law school. Ms. Medina is a graduate of the University of Oklahoma and the Oklahoma City University School of Law. She started working at Michael Brooks Jiminez P.C. as an associate attorney in April 2025 where she regularly accompanied clients to ICE check-ins and other appointments at the ICE Office located at 1220 Sovereign Row, Oklahoma City, OK 73108 (“Sovereign Bow Building”). From April 2025 through March 12, 2026, the only security measure that Ms. Medina was required to undergo to enter the building was walking through a metal detector at the entrance. She was not required to relinquish her phone and she was not subject to a wand metal detector search. Moreover, Ms. Medina never saw ICE agents near home or following her while she drove.

On Monday, March 16, 2026, Ms. Medina accompanied a client to a routine check-in appointment at the Sovereign Row building. Ms. Medina and her client were meeting with Officer F/N/U Guzman when he informed them that the client would need to be taken into custody. Given the circumstances of her client’s case, Ms. Medina believed there should be an alternative to taking her client into custody. Accordingly, she requested to speak with Guzman’s supervisor. Guzman refused and said that his supervisor was not available. When Ms. Medina stated that she would be willing to wait for the supervisor, Officer Guzman became angry and yelled at Ms. Medina. When Ms. Medina stated that she would wait for the supervisor, a second officer, Ethan Taylor entered the room. Taylor and Guzman grabbed Ms. Medina’s client almost striking her and she feared that Guzman was going to make physical contact with her. Guzman then shoved Ms. Medina as he escorted her client outside of the room and threatened her with arrest. After her client was taken into custody, Ms. Medina was ordered to leave the building. While she was in her car in the parking lot, an ICE officer approached her car and told her she needed to wait in the lobby to retrieve her client’s file that she brought to the check-in appointment. Ms. Medina posted about her experience with Officer Guzman on her Facebook page.

After waiting for 30 minutes, an officer directed her to re-enter the building. When she arrived in the lobby, Guzman, Taylor, and Guzman’s supervisor were waiting for her. The supervisor threatened her with arrest for assault and battery of a federal agent. Ms. Medina updated the Facebook post to include the supervisor’s threat later that day.



The next morning, on March 17, when Ms. Medina arrived at her office and she was informed by her colleague Ceasar Cano that she had been banned from entering the ICE building. Mr. Cano said that he had learned about Ms. Medina's ban from their boss Michael Jimenez Brooks. Shortly after speaking with Mr. Cano, Mr. Brooks came to Ms. Medina's office. Mr. Brooks had just returned from the ICE office where he had spoken with Guzman's supervisor. Mr. Brooks advised Ms. Medina that she needed to go and meet with Officer Guzman to deescalate the situation. Mr. Brooks also told her that she could not be a good advocate for her clients if she had tension with ICE employees.

Later that morning around 11:50am, Ms. Medina went to the ICE office where she was met in the lobby by Officer Taylor. She was directed to the same room where her client was detained the day before. Officer Guzman was sitting in the room with an individual in a white polo and khakis that identified himself as a Homeland Security Investigations (HSI) officer. Ms. Medina started the conversation by apologizing to Guzman for her part in their tense interaction the day before. Officer Guzman and the HSI agent directed her to delete her Facebook post about the incident. Ms. Medina took a screenshot of the post and did as she was instructed using her phone to delete the post in their presence. The HSI agent then encouraged her to make another post in which she detailed how her actions against Guzman were wrong. The HSI agent said that while they could make her delete her previous post, they could not force her to make a positive post about officer Guzman. Ms. Medina declined to make a positive post about Guzman.

After the meeting with the HSI agent, Guzman, and Taylor, Ms. Medina was permitted to enter the ICE building on several occasions but she was subjected to new security protocols including being required to relinquish her phone and be searched by a metal wand in addition to walking through a metal detector. The security staff at the building have made joking references to her being a risk to their safety, raising their hands in surrender when she enters the building. Additionally, from March 17 through May, Ms. Medina was regularly surveilled by ICE agents at her home and as she drove around Oklahoma City.

Ms. Medina resigned from her position at Brooks Jimenez in early August 2026 in part because her supervisors blamed her for the March 16th incident and continued to push her to make amends with ICE agents.



Personal Injury (Question 10)

As a result of the actions of the federal government, its employees, and its contractors, Ms. Medina suffered physical and emotional injury, professional and reputational harm, fear and apprehension of physical contact, humiliation, emotional distress, loss of enjoyment of life, and damages resulting from her being placed in fear of being struck, pushed, banned from the building, and threatened. This is not intended to be an exhaustive list of possible causes of action.

Witnesses (Question 11)

Ethan Taylor

Michael Jimenez Brooks

Natalia Riveros Jacobsen

Cesar Cano

Carrie Fox

Ruben J. Medina

Officer F/N/U Guzman