

**FORMAL GRIEVANCE AND NOTICE OF
INDEPENDENT OVERSIGHT DEMAND**

**Death of Parady La in ICE Custody
(Philadelphia, Pennsylvania)**

**Re: Demand for Independent Investigation,
Criminal Referral, and Preservation of
Evidence Regarding the Custodial Death of
Parady La**

**I submit this grievance and notice to
formally demand independent
investigation, accountability review, and
prosecution where warranted concerning
the death of Parady La, who died on or
about January 9, 2026, after collapsing
while detained in the custody of U.S.
Immigration and Customs Enforcement
(ICE) at the Federal Detention Center,**

Philadelphia, and later being transferred to Thomas Jefferson University Hospital.

This letter is not directed to current Department of Justice political leadership for discretionary review. It is submitted instead to statutorily independent oversight bodies, external authorities, and mandatory-jurisdiction entities that retain investigative, disciplinary, or oversight authority independent of the current DOJ chain of command.

STATEMENT OF CONCERN

Available reporting and ICE disclosures indicate that:

Parady La was taken into ICE custody on or about January 6, 2026.

Within approximately 24 hours, he was found unresponsive in detention.

Emergency medical intervention included CPR and multiple doses of naloxone.

ICE has publicly attributed the incident to

severe drug withdrawal.

Mr. La subsequently suffered anoxic brain injury, cardiac arrest, multi-organ failure, and died days later.

Deaths due to unmanaged withdrawal are well-documented, foreseeable, and preventable in custodial settings when appropriate medical screening, monitoring, and treatment protocols are followed. Failure to provide such care raises serious questions of deliberate indifference, medical neglect, and civil-rights violations under color of law.

LEGAL AND OVERSIGHT IMPLICATIONS

This death implicates, at minimum:

Constitutional due-process protections applicable to all persons in federal custody

Federal civil-rights statutes governing deprivation of life under color of law

Custodial medical-care standards and clinical duty-of-care obligations

**Wrongful death and medical–negligence frameworks under Pennsylvania law
International human–rights obligations applicable to detention and custodial deaths**

The existence of internal ICE or DHS reviews does not satisfy independent–investigation requirements, particularly where the same agency controls evidence, personnel statements, and medical documentation.

LEGAL AUTHORITY AND GOVERNING PRECEDENT

The death of Parady La while in federal immigration custody implicates well–established constitutional, statutory, and common–law duties governing custodial care, medical treatment, and deprivation of life under color of law.

1. Constitutional Duty to Provide Medical Care in Custody

Persons held in federal detention—regardless of immigration status—are protected by the Due Process Clause of the Fifth Amendment from deliberate indifference to serious medical needs. The Supreme Court has long held that custodial authorities violate constitutional protections when they fail to provide adequate medical care to detainees or prisoners, particularly where risks are known or obvious.¹

Drug withdrawal is a known, foreseeable, and medically dangerous condition requiring clinical monitoring and intervention. Failure to screen, monitor, or treat withdrawal in custody has repeatedly been recognized by federal courts as a basis for constitutional liability.²

2. Deliberate Indifference and Objective Unreasonableness

Where officials know of and disregard an

excessive risk to detainee health or safety, constitutional violations arise even absent specific intent to cause harm.³ In custodial–death cases involving pretrial or civil detainees, courts apply an objective reasonableness standard, under which liability attaches when conduct is objectively unreasonable in light of known medical risks.⁴

3. Federal Civil–Rights Liability Under Color of Law

Federal officers who willfully deprive a person of constitutional rights under color of law may be subject to criminal liability pursuant to 18 U.S.C. § 242, as well as civil liability under recognized constitutional–tort frameworks. Custodial deaths resulting from medical neglect have repeatedly formed the basis for federal investigation and prosecution under this statute.⁵

4. Federal Tort Claims and Wrongful Death

The United States may be held liable for wrongful death and medical negligence under the Federal Tort Claims Act (FTCA) where federal employees or contractors breach a duty of care owed under state law.⁶ Pennsylvania law recognizes wrongful death and survival claims where negligence contributes to death, including in custodial and institutional medical settings.⁷

5. Independent Oversight Obligations

Internal agency reviews do not satisfy constitutional or statutory accountability requirements where the agency itself controls evidence, witnesses, and medical documentation. Independent investigation is required to preserve due-process integrity, public confidence, and compliance with domestic and international legal obligations.⁸

FORMAL DEMANDS

**I formally demand the following actions:
Independent investigation by oversight
bodies with authority separate from DHS
and ICE operational command.**

**Preservation of all evidence, including but
not limited to:**

Intake screenings

**Medical assessments and treatment
records**

Detention logs and observation checks

Surveillance footage

**Communications between ICE, medical
staff, and contractors**

**External forensic and medical review of
withdrawal-management decisions and
response timelines.**

**Criminal referral where evidence supports
violations of federal or state law.**

**Public accountability reporting sufficient
to permit meaningful oversight and future**

legal review.

This letter constitutes notice of anticipated oversight action and potential civil litigation, triggering record–retention obligations.

**IMPORTANT: WHERE TO SEND
(SEND SEPARATELY – DO NOT COMBINE)**

Each recipient below serves a different legal function.

Do not send one combined packet. Send the same letter individually to each.

**1. DOJ OFFICE OF THE INSPECTOR
GENERAL (INDEPENDENT)**

Purpose: Criminal referral, misconduct investigation, evidence preservation

Send to:

**U.S. Department of Justice
Office of the Inspector General
950 Pennsylvania Avenue NW
Washington, DC 20530
<https://oig.justice.gov>**

2. DHS OFFICE OF THE INSPECTOR GENERAL (INDEPENDENT)

**Purpose: DHS/ICE misconduct, detention
oversight**

Send to:

Department of Homeland Security

Office of Inspector General

245 Murray Lane SW

Washington, DC 20528

<https://www.oig.dhs.gov>

3. PENNSYLVANIA ATTORNEY GENERAL (STATE AUTHORITY)

**Purpose: Wrongful death, medical
negligence, state criminal jurisdiction**

Send to:

Office of the Attorney General of

Pennsylvania

Strawberry Square

Harrisburg, PA 17120

<https://www.attorneygeneral.gov>

4. PENNSYLVANIA DEPARTMENT OF

HEALTH / MEDICAL BOARD

**Purpose: Medical–licensing review,
clinical–care failures**

Send separately to:

PA Department of Health

State Board of Medicine

5. CONGRESSIONAL OVERSIGHT COMMITTEES

**Purpose: Oversight record, subpoena
groundwork, future hearings**

Send separately to each:

House Judiciary Committee

Senate Judiciary Committee

**House Oversight & Accountability
Committee**

Senate Homeland Security &

Governmental Affairs Committee

**(Use official committee submission
portals or certified mail.)**

6. UNITED NATIONS SPECIAL RAPPORTEURS (OPTIONAL BUT

STRATEGIC)

Purpose: International record, external pressure, human–rights documentation

Send individually to:

Special Rapporteur on Extrajudicial Executions

Special Rapporteur on Torture

Working Group on Arbitrary Detention

(Online submission portals accepted.)

FOOTNOTES / AUTHORITIES

¹ Estelle v. Gamble, 429 U.S. 97, 104–05 (1976).

² See, e.g., Foelker v. Outagamie County, 394 F.3d 510, 513–14 (7th Cir. 2005); Kelley v. County of Wayne, 325 F. Supp. 2d 788, 794–95 (E.D. Mich. 2004) (recognizing serious medical risk posed by withdrawal).

³ Farmer v. Brennan, 511 U.S. 825, 837 (1994).

⁴ Kingsley v. Hendrickson, 576 U.S. 389,

396–97 (2015); see also *Miranda v. County of Lake*, 900 F.3d 335, 352–53 (7th Cir. 2018) (applying objective reasonableness to detainee medical-care claims).

⁵ 18 U.S.C. § 242; see *United States v. Lanier*, 520 U.S. 259, 264–65 (1997).

⁶ 28 U.S.C. §§ 1346(b), 2671–2680.

⁷ 42 Pa. Cons. Stat. §§ 8301–8302.

⁸ See *City of Revere v. Mass. Gen. Hosp.*, 463 U.S. 239, 244–45 (1983); *Hope v. Pelzer*, 536 U.S. 730, 738 (2002).

CLOSING

The death of Parady La is not an isolated tragedy. It reflects systemic custodial failures that demand independent scrutiny, not internal closure. Silence or inaction by responsible authorities will itself become part of the record.

This grievance is submitted in good faith,

**for the purpose of accountability,
oversight, and the preservation of the rule
of law.**

Respectfully submitted,

[Your Name]

[City, State]

[Email]