

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

ANDRANIK GRIGORYAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 3:26-cv-1109
	)	
CENTURION HEALTH OF INDIANA, LLC,	)	
	)	
Defendant.	)	

Complaint for Damages

Introduction

1. The United States Immigration and Customs Enforcement agency (“ICE”) has contracted with the Indiana Department of Correction (“DOC”) to house detainees being held pending civil immigration proceedings or removal at the Miami Correctional Facility (“Miami”). The staff in the cell blocks that house the ICE detainees are DOC employees. Medical care is provided by Centurion Health of Indiana, LLC (“Centurion”), the medical provider with which the DOC has contracted to provide all medical care, including both medical and mental health services, to its incarcerated population.

2. Centurion has failed to provide sufficient staff to assure the health and safety of the ICE detainees. This is objectively unreasonable and as a result, the health and safety of the detainees are neglected. This lack of staffing and neglect resulted in Andranik Grigoryan, a former ICE detainee at Miami, suffering serious injuries and caused a

violation of his rights protected by the Fourteenth Amendment to the United States Constitution. He is entitled to his damages.

Jurisdiction, venue, and cause of action

3. This Court has jurisdiction of this case pursuant to 28 U.S.C. § 1331.
4. Venue is proper in this district pursuant to 28 U.S.C. § 1391.
5. Plaintiff brings this case pursuant to 42 U.S.C. § 1983 to redress the deprivation, under color of state law, of rights secured by the United States Constitution.

Parties

6. Andranik Grigoryan is an adult resident of New York.
7. Centurion Health of Indiana, LLC is an Indiana domestic limited liability company.

Factual allegations

8. The DOC has entered into a contract with ICE to house civil detainees at Miami.
9. For each ICE detainee it houses, the DOC is paid \$ 291 a day by ICE.
10. The DOC has agreed to provide ICE with up to 1,000 beds at Miami for detainees, which, according to the DOC, is anticipated to general between \$34 million and \$53 million in 2026. Indiana Department of Correction, *2025 Year in Review*, p. 15 <https://online.flippingbook.com/view/388948878/> (last visited July 21, 2026).
11. The detainees are housed in buildings separate from DOC prisoners, but the buildings all have a similar floor plan.

12. The detainees are housed in cells that can each hold two persons.
13. The detainees are not incarcerated at Miami after being sentenced to the DOC pursuant to criminal convictions. They are civil detainees.
14. The DOC is legally and constitutionally responsible for providing adequate medical care to all persons confined in DOC institutions, including persons civilly detained by ICE and housed at Miami.
15. The DOC contracts the provision of medical and mental health care to Centurion and, as a result, Centurion, although a private company, shares the legal and constitutional responsibility to provide adequate medical care to those detained.
16. Andranik Grigoryan is not a citizen of the United States and was held in detention by ICE in various locations from December 7, 2023 to May 15, 2026.
17. He was freed from ICE custody on May 15, 2026 after prevailing in a habeas corpus action.
18. From December 30, 2025 to May 15, 2026, he was detained by ICE at Miami and was held in housing units with other ICE detainees.
19. Mr. Grigoryan has epilepsy. However, his seizures are largely controlled by the medication Keppra.
20. He is prescribed two Keppra pills a day, each 1,000 mg., with one to be taken in the morning and one in the evening.
21. A drug's capacity to remain in an individual's system is measured by its "half-

life,” which refers to the amount of time that it takes for the concentration of the medication in an individual’s body to reduce by exactly half. The half-life of Keppra is only approximately 6-8 hours for adults with normal kidney function. To the best of his knowledge, Mr. Grigoryan has normal kidney function.

22. Because of the short amount of time that Keppra stays at full strength in the body, Keppra is typically taken twice a day to ensure that there is a therapeutic dose in the patient’s bloodstream to prevent an increased probability of seizures.

23. When he first was prescribed Keppra, before he was in ICE custody, his doctor told him that it was very important that he take the medication at the times prescribed so the medicine would balance out in his body.

24. Missing a single dose of Keppra could lead to a seizure that would otherwise not have occurred if the medication had been taken because the half-life of the medication is so brief and, as a result, missed medication will lead to a quick and precipitous drop of the blood levels of the medication.

25. There is also an extended-release medication, Keppra XR, which only needs to be taken once a day because it results in the medication being released gradually throughout the day to ensure that patients maintain a therapeutic dose in their systems for a longer period of time. However, while confined at Miami, Mr. Grigoryan was prescribed regular Keppra, which had to be taken twice a day to maintain a therapeutic dose.

26. Mr. Grigoryan has been taking Keppra because of his seizure disorder since

approximately 2020.

27. Mr. Grigoryan was originally on a smaller dose of Keppra. But once it was changed to 1000 mg., twice a day, he has found that as long as he takes the correct dosage of his Keppra, at the frequency with which it is prescribed, he rarely has seizures.

28. In the other institutions where he was confined by ICE prior to being sent to Miami, he generally received his Keppra as prescribed and his seizure activity remained largely under control once he received the twice-daily dose of 1,000 mg. of the medication.

29. Prior to the seizure described below that happened on January 22, 2026, he had not had a seizure for almost a year.

30. When he received the Keppra twice a day at Miami in January of 2026, he would receive his morning medication between 3:30 a.m. and 4:30 a.m., when he went to breakfast, and would receive his evening medication at variable times between 4:30 and 6:30 p.m., when he received dinner.

31. The medical office, from which medication was dispensed, was on the way to the dining hall and he and other prisoners would stop there on the way to their meal for medication.

32. The medical staff in the medical office were employed by Centurion.

33. However, in the weeks after his confinement at Miami began, he noticed that Centurion employed an insufficient number of medical staff in D-Building, where he was

housed.

34. As a result, prisoners had difficulty in being seen for medical issues and there were times when Centurion medical staff simply were not present and available to meet the medical needs of the detainees.

35. The inadequacy of the number of Centurion staff frequently resulted in no Centurion employees being present to pass out medication in the mornings and the office where medication was dispensed was closed. When this happened, no medicine was dispensed and Centurion employees made no effort to dispense the missed doses at a later time.

36. Because there was insufficient Centurion medical staff present there were times in January of 2026 when Mr. Grigoryan failed to receive his Keppra as prescribed. Specifically, Centurion employees were not present to dispense his morning dose of the medication and he failed to receive it.

37. On January 21, 2026, Mr. Grigoryan received his evening dose of Keppra prior to 6:00 p.m.

38. Mr. Grigoryan was supposed to receive his morning dose during breakfast, from 3:30 a.m. to 4:30 a.m. on January 22, 2026.

39. There were no Centurion staff to dispense medication in the morning that day and therefore he did not receive his morning dose of Keppra and Centurion staff never supplied him with the missed dose.

40. Sometime after 9:30 a.m. on January 22, 2026, Mr. Grigoryan had a severe seizure while in his cell. Given the half-life of Keppra, at this point Mr. Grigoryan would have had very little of the medication left in his body.

41. Immediately after a seizure, during what is called the postictal period, persons with Mr. Grigoryan's condition may experience confusion, disorientation, and exhaustion. As a result, Mr. Grigoryan does not remember the immediate after effects of the seizure.

42. However, he does know that he hit his head during the seizure and was lying in a pool of blood when correctional staff eventually came to his cell.

43. Some of the injuries can be seen in photographs taken by a family member during a video call a few days after his seizure. (Exhibit 1).

44. He was taken to a local hospital where he spent the day being treated for a head wound and the after effects of the seizure and was returned to Miami in the evening. The head wound was glued together at the hospital.

45. Shortly after returning to the facility, he was moved to a cell in B Building at Miami and was held thereafter in a cell in C Building and then back to a cell in D Building, where he stayed until he was released from Miami and ICE custody.

46. The lack of Centurion staffing and the resultant medical neglect was apparent in the other buildings where he was housed at Miami.

47. For example, on a number of occasions, he did not receive his prescribed dose of

Keppra and on at least one occasion Centurion staff told him that they had run out of Keppra and he did not receive it at least three days. On other occasions he would be given a double dose of Keppra at night and was told to take the extra dose in the morning, presumably because there would be no medical staff present in the morning.

48. At times when he received a double dose of medication he held back the extra dose as he was concerned that there would again be days that he received no medicine at all and he wanted to be certain that he could take at least one pill a day.

49. Although Mr. Grigoryan did not suffer any more seizures while at Miami, he was forced to live in constant fear and anxiety that he would again have a seizure and suffer serious injury.

50. Centurion was aware of the extreme staffing shortages at Miami and other problems with the provision of medical care at Miami, leading directly to Mr. Grigoryan's injuries, and failed to remedy this problem. This was objectively unreasonable and imposed punishment on Mr. Grigoryan.

51. Centurion's policies and practices led directly to Mr. Grigoryan's injuries.

52. Centurion violated Mr. Grigoryan's right to adequate health care to address his serious medical needs.

53. At all times defendant acted under color of state law.

Jury trial demand

54. Plaintiff requests a jury trial on all issues so triable.

Legal claim

55. By having policies and practices that denied plaintiff adequate medical care to address his serious medical need causing plaintiff injury, defendant violated plaintiff's rights under the due process clause of the Fourteenth Amendment to the United States Constitution.

Requested relief

WHEREFORE, plaintiff requests that this Court:

- a. accept jurisdiction of this case and set it for hearing at the earliest opportunity;
- b. award plaintiff his damages after a jury trial;
- c. award plaintiff his costs and reasonable attorneys' fees pursuant to 42 U.S.C. § 1988.
- d. award plaintiff all other proper relief.

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