



County of Los Angeles

December 17, 2024

Dawyn R. Harrison  
County Counsel

**Board of Supervisors**

Hilda L. Solis  
Supervisor, First District

Holly Mitchell  
Supervisor, Second District

Lindsey P. Horvath  
Supervisor, Third District

Janice Hahn  
Supervisor, Fourth District

Kathryn Barger  
Supervisor, Fifth District

TO: EDWARD YEN  
Executive Officer  
Board of Supervisors

Attention: Agenda Preparation

FROM: ADRIENNE M. BYERS  
Litigation Cost Manager

RE: **Item for the Board of Supervisors' Agenda  
County Claims Board Recommendation  
Heidi Sam v. Francisco Aban Ong, Jr., et al.  
Los Angeles Superior Court Case No. 21STCV11118**



Attached is the Agenda entry for the Los Angeles County Claims Board's recommendation regarding the above-referenced matter. Also attached is the Case Summary and Summary Corrective Action Plan to be made available to the public.

It is requested that this recommendation, Case Summary, and Summary Corrective Action Plan be placed on the Board of Supervisors' agenda.

AMB:lzs

Attachments

## Board Agenda

### MISCELLANEOUS COMMUNICATIONS

Los Angeles County Claims Board's recommendation: Authorize settlement of the matter entitled Heidi Sam v. Francisco Aban Ong, Jr., et al., Los Angeles Superior Court Case No. 21STCV11118, in the amount of \$162,500, and instruct the Auditor-Controller to draw a warrant to implement this settlement from the Sheriff's Department's budget.

This lawsuit arises from injuries Plaintiff allegedly sustained in a traffic collision involving a Sheriff's Department employee.

## CASE SUMMARY

### INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION

CASE NAME	Heidi Sam vs. Francisco Aban Ong, Jr., et al.
CASE NUMBER	21STCV11118
COURT	Los Angeles Superior Court
DATE FILED	March 23, 2021
COUNTY DEPARTMENT	Sheriff's Department
PROPOSED SETTLEMENT AMOUNT	\$ 162,500
ATTORNEY FOR PLAINTIFF	Daniel Azizi, Esq. Downtown LA Law Group
COUNTY COUNSEL ATTORNEY	Kevin J. Engelen Senior Deputy County Counsel
NATURE OF CASE	This case occurred from a traffic collision involving Plaintiff Heidi Sam and Los Angeles Sheriff's Department employee Francisco Aban Ong, Jr.  Due to the risks and uncertainties of litigation, a full and final settlement of the case is warranted.
PAID ATTORNEY FEES, TO DATE	\$ 34,390
PAID COSTS, TO DATE	\$ 10,146



## Summary Corrective Action Plan

The intent of this form is to assist departments in writing a corrective action plan summary for attachment to the settlement documents developed for the Board of Supervisors and/or the County of Los Angeles Claims Board. The summary should be a specific overview of the claims/lawsuits identified root causes and corrective actions (status, time frame, and responsible party). This summary does not replace the Corrective Action Plan form. If there is a question related to confidentiality, please consult County Counsel.

Date of incident/event:	March 19, 2020, at approximately 8:40 a.m.
Briefly provide a description of the incident/event:	<p style="text-align: center;">Summary Corrective Action Plan 2023-143</p> <p><b>Details in this document summarize the incident. The information provided is a culmination of various sources to provide an abstract of the incident.</b></p> <p>Multiple investigative reports indicated on Thursday, March 19, 2020, at approximately 8:40 a.m., an on-duty Los Angeles County employee was driving an unmarked county vehicle northbound on the 101 Freeway when a traffic collision occurred.</p> <p>Employee One was driving northbound in the number one lane on the 101 Freeway at 65 mph. He looked to his right, and when he looked forward, he saw traffic ahead had abruptly stopped.</p> <p>His vehicle was approximately three car lengths away from the Plaintiff's vehicle, but he did not have enough distance to stop. The front of Employee One's vehicle collided with the rear of the Plaintiff's vehicle, which was stopped in his lane directly in front of him. The force of the collision caused the Plaintiff's vehicle to collide with the rear of an unknown third party's vehicle.</p> <p>The Plaintiff did not have any visible injuries.</p> <p>Employee One was wearing a factory-installed seatbelt at the time of the collision.</p> <p>A Los Angeles County Sheriff's Department Sergeant was notified of the traffic collision and responded to the location. The Sergeant authored a Supervisor's Report of Incident or Damage to County Vehicle.</p> <p>An officer from the California Highway Patrol responded and conducted a traffic collision investigation. His investigation concluded Employee One was the primary cause of the traffic collision by operating a vehicle at speeds faster than is reasonable or prudent, in violation of California Vehicle Code Section 22350.</p>

	<p><b>The involved Employee's statement is based on the Supervisor's Report of Incident or Damage to County Vehicle:</b></p> <p>Employee One stated he was driving northbound on the 101 freeway at approximately 65 mph. He looked to his right, and when he looked back, he saw traffic had stopped abruptly. He applied his brakes but did not have enough time to conduct an "evasive maneuver," and rear ended the Plaintiff's vehicle. Employee One then notified a supervisor.</p>
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1. Briefly describe the **root cause(s)** of the claim/lawsuit:

The **Department** root cause of this incident is Employee One's operations of a vehicle at speeds faster than is reasonable or prudent, a violation of California Vehicle Code Section 22350.

2. Briefly describe recommended corrective actions:  
(Include each corrective action, due date, responsible party, and any disciplinary actions if appropriate)

**Traffic Collision Investigation**

This incident was thoroughly investigated by representatives from the California Highway Patrol.

The collision investigation concluded that the employee caused the collision by operating a vehicle at speeds faster than is reasonable or prudent in violation of California Vehicle Code Section 22350.

**Supervisor's Report of Incident or Damage to County Vehicle**

The incident was investigated by a representative from Scientific Services Bureau to determine if any administrative misconduct occurred stemming from the traffic collision. The results of the investigation were presented for Department executive adjudication.

Executive evaluation found the collision was preventable and appropriate administrative action was taken.

The employee involved in this incident received training surrounding the circumstances pertaining to this incident.

**Traffic Collision Assessment and Review**

Scientific Services Bureau conducted a review and assessment of their traffic collisions for the calendar year 2019 through the end of 2023. The audit revealed the following:

There were 36 traffic collisions for this five-year period, 20 of which were found to be preventable.

Personnel who have been involved in more than one collision are directed to attend Department training.

**Sheriff Department Announcement – Department-Wide Rebrief**

The purpose of this rebrief is to remind Department personnel that the safety of Department members and the public is paramount when engaged in routine driving and code-3 responses.

It is essential to maintain heightened officer safety, common sense, and sound tactics to reduce collision-related injuries, deaths, and financial liability to the Department.

**Department Expanded Briefing**

In hopes of further mitigating financial liability to the Department as a result of traffic collisions, representatives from the Department briefed the participants of Department driving courses on current trends related to Department driving practices.

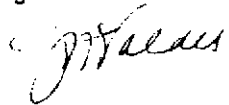
County of Los Angeles  
Summary Corrective Action Plan


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3. Are the corrective actions addressing Department-wide system issues?


- Yes – The corrective actions address Department-wide system issues.  
 No – The corrective actions are only applicable to the affected parties.

Los Angeles County Sheriff's Department

Name: (Risk Management Coordinator)  Julia M. Valdes, A/Captain Risk Management Bureau	
Signature: 	Date: 09/20/24

Name: (Department Head)  Jill Torres, Assistant Sheriff Chief Financial and Administrative Officer	
Signature: 	Date: 9/19/24

<b>Chief Executive Office Risk Management Inspector General USE ONLY</b>
Are the corrective actions applicable to other departments within the County?  <input checked="" type="checkbox"/> Yes, the corrective actions potentially have County-wide applicability. <input type="checkbox"/> No, the corrective actions are applicable only to this Department.

Name: Betty Karmirlian (A/Risk Management Inspector General)	
Signature: 	Date: 9/20/24