



County of Los Angeles

January 14, 2025

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
Haik Shabazian v. County of Los Angeles, et al.
Los Angeles Superior Court Case No. 22AVCV00239**



Attached is the Agenda entry for the Los Angeles County Claims Board's recommendation regarding the above-referenced matter. Also attached are 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 Haik Shabazian v. County of Los Angeles, et al., Los Angeles Superior Court Case No. 22AVCV00239, in the amount of \$130,000, and instruct the Auditor-Controller to draw a warrant to implement this settlement from the Fire Department's budget.

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

CASE SUMMARY

INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION

| | |
|-----------------------------|--|
| CASE NAME | Haik Shabazian vs. County of Los Angeles, et al. |
| CASE NUMBER | 22AVCV00239 |
| COURT | Los Angeles Superior Court |
| DATE FILED | April 7, 2022 |
| COUNTY DEPARTMENT | Fire Department |
| PROPOSED SETTLEMENT AMOUNT | \$ \$130,000 |
| ATTORNEY FOR PLAINTIFF | Oganes J. Sachmanyman, Esq. Sachmanyman Law Firm P.C. |
| COUNTY COUNSEL ATTORNEY | Kevin J. Engalien Senior Deputy County Counsel |
| NATURE OF CASE | This case occurred from a traffic collision involving Plaintiff, Haik Shabazian and Los Angeles County Fire Department employee, Terry Lee Brown. Due to the risks and uncertainties of litigation, a full and final settlement of the case is warranted. |
| PAID ATTORNEY FEES, TO DATE | \$ 35,390 |
| PAID COSTS, TO DATE | \$ 17,836 |



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: | October 27, 2021 |
| Briefly provide a description of the incident/event: | <p>At approximately 2:50 p.m. on October 27, 2021, Plaintiff was stopped at a red light on Avenue L in Lancaster, California. Plaintiff was driving a black 2020 GMC Sierra. Medium Truck Driver (MTD) was stopped behind Plaintiff in a Department vehicle (a red 2014 Dodge Ram). When the light turned green, Plaintiff began to make a U-turn. MTD also made a U-turn, turned on the emergency lights for safety but accidentally activated the siren. Plaintiff abruptly stopped, and MTD was unable to stop in time before rear-ending Plaintiff.</p> <p>MTD did not notify Dispatch or his supervisor of the collision. There was minor damage to Plaintiff's vehicle reported on the Traffic Collision Report, and Plaintiff was able to drive his vehicle from the accident scene.</p> |

1. Briefly describe the root cause(s) of the claim/lawsuit:

- A. The MTD's failure to observe a safe driving distance.
- B. The MTD's inappropriate use of lights and siren.
- C. A non-associated root cause is the MTD failed to make immediate notifications to Dispatch and his supervisor.

2. Briefly describe recommended corrective actions:

(Include each corrective action, due date, responsible party, and any disciplinary actions if appropriate)

A/B/C.1 The Department initiated an internal investigation on September 22, 2023 into the accident that occurred on October 27, 2021. The MTD was issued a Notice to Suspend for 3 Days on July 10, 2024.

A/B/C.2 On June 6, 2024, a Training Action Plan was developed for the MTD (which was completed on July 17, 2024). The 11 hour training consists of the following:

- OnQ Safety EVOC Intersection Analysis (2.5 hours);
- OnQ Safety Defensive Driving Course (Sight Speed and Space Management, Search and Scan, Judging Safe Distance, Hazard Recognition, Backing, Attention and Distraction) (3.5 hours);
- In-Person Classroom Instruction with Regional Training Safety Officer (2 hours);

- Driver Simulator (2 hours); and
- Defensive Driver Training (1 hour).

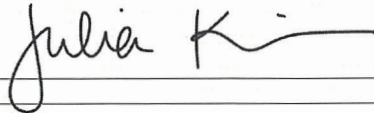
3. Are the corrective actions addressing department-wide system issues?

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

Name: (Risk Management Coordinator)

Julia Kim

Signature:



Date:

September 13, 2024

Name: (Department Head)

ANTHONY C. MARONE

Signature:



Date:

9/13/24

Chief Executive Office Risk Management Inspector General USE ONLY

Are the corrective actions applicable to other departments within the County?

- Yes, the corrective actions potentially have County-wide applicability.
- No, the corrective actions are applicable only to this department.

Name: (Risk Management Inspector General)

Betty Karmirlian, Acting Risk Management Inspector General

Signature:



Date:

09/13/2024