



County of Los Angeles

June 10, 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

A handwritten signature in blue ink, appearing to read 'AMB'.

RE: **Item for the Board of Supervisors' Agenda**
County Claims Board Recommendation
LL John Doe MB v. Defendant Doe School District, et al.
Los Angeles Superior Court Case No. 22STCV39133



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 LL John Doe MB v. Defendant Doe School District, et al., Los Angeles Superior Court Case No. 22STCV39133, in the amount of \$350,000, and instruct the Auditor-Controller to draw a warrant to implement this settlement from the Probation Department's budget.

This lawsuit alleges that Plaintiff was sexually assaulted by a former deputy probation officer assigned to a high school operated by LAUSD.

CASE SUMMARY

INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION

CASE NAME	Doe MB, LL John v. Defendant Doe School District, et al.
CASE NUMBER	22STCV39133
COURT	Los Angeles Superior Court
DATE FILED	December 16, 2022
COUNTY DEPARTMENT	Probation Department
PROPOSED SETTLEMENT AMOUNT	\$ 350,000
ATTORNEY FOR PLAINTIFF	Jenn Liakos, Esq. Jenn Liakos Law
COUNTY COUNSEL ATTORNEY	Jonathan McCaverty Assistant County Counsel
NATURE OF CASE	<p>This is a recommendation to settle for \$350,000, inclusive of attorneys' fees and costs, a lawsuit filed by Plaintiff LL John Doe MB against the County of Los Angeles, the County Probation Department and Los Angeles Unified School District ("LAUSD") alleging he was sexually assaulted over the course of a few years by a probation officer who was assigned to a high school operated by LAUSD in the 1990s.</p> <p>Given the risks and uncertainties of litigation, a reasonable settlement at this time will avoid further litigation costs; therefore, a full and final settlement of the case is warranted.</p>
PAID ATTORNEY FEES, TO DATE	\$ 36,986
PAID COSTS, TO DATE	\$ 2,832



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:	1994-1996
Briefly provide a description of the incident/event:	<p>Plaintiff alleges he was sexually assaulted by a former Deputy Probation Officer (DPO) assigned to a Los Angeles Unified School District (LAUSD) Fremont High School in the 1990s. Plaintiff alleges that after building trust, the DPO engaged in sexual misconduct with Plaintiff multiple times over several years beginning in or around 1994. Plaintiff alleges incidents occurred in the DPO's office and once at his home when they stopped by on their way to an outing off school grounds.</p> <p>The Department did not have knowledge of these allegations until Plaintiff served his Complaint in May 2023.</p>

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

<p>A. Lack of school supervision program specific policies and training, including but not limited to professional boundaries, guidelines for transporting or contact with non-probation and probation youth when assigned to a school setting or conducting field activities.</p> <p>B. Inadequate supervision and monitoring of DPO's assigned to the School Supervision Program (SSP) or conducting field activities.</p> <p>C. Inadequate transportation reporting protocol and dispatch system.</p> <p>D. Employee misconduct in violation of law and Department/County policies.</p>

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

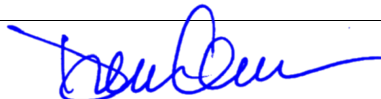
- A.1 Develop policies for school supervision program to include, professional boundaries training, guidelines for contacts/transportation of probation and non-probation youth for approved school and field work activities. Develop and implement training specific to officers assigned to school supervision program.
- B.1 Revise and reissue policies for mandatory Supervising Deputy Probation Officer contacts with Deputy Probation Officers assigned to off-site locations, school site administrators, review and revise supporting policies and processes to improve accountability, communications, and monitoring.
- Develop an orientation and/or training for school site administrators to clearly define the purpose and role of the Deputy Probation Officers assigned to their campus, including notification protocols to report concerns or issues. Also, establish and maintain a quarterly administrative meeting to discuss program progress, employee performance, program needs, quality of services, concerns, etc.
- Develop and issue an annual notification of Authorized and Unauthorized School Deputy Probation Officer Activities to school districts with assigned Deputy Probation Officers.
- C.1 Assess lack of field dispatch system for Probation to determine how to properly receive, monitor, and archive information regarding youth transports between locations. Develop and implement an appropriate and useful Probation Dispatch system, policies, training guidelines, etc. to properly monitor transports and field activities of Deputy Probation Officers.
- D.1 The employee retired from County service in 2013. The Department was not able to investigate the allegations made by the Plaintiff because the Department was not aware of the allegations until it received the Plaintiff's complaint in May 2023.

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)
Crystal Hurtado by Deanna Carlisle

Signature:



Date:

04/18/25

Name: (Department Head) Guillermo Viera Rosa, by:	
Signature: <i>Robert Smythe</i>	Date: 04/18/2025

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	
Signature: <i>Betty Karmirlian</i>	Date: 4/18/2025