



County of Los Angeles

July 29, 2025

Dawyn R. Harrison
County Counsel

Board of Supervisors

Hilda L. Solis
Supervisor, First District


Holly J. 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

FROM: TIMOTHY J. KRAL 
Assistant County Counsel
Justice and Safety Division

RE: **Item for the Board of Supervisors' Agenda**
County Contract Cities Liability Trust Fund
Claims Board Recommendation
Pariente, Raphael Zapotitla v. County of Los Angeles, et al.
Los Angeles Superior Court Case No. 22STCV07401



Attached is the Agenda entry for the Los Angeles County Contract Cities Liability Trust Fund Claims Board's recommendation in the above-referenced matter. Also attached is the Case Summary and the Summary Corrective Action Plan for the case.

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

TJK:sr

Attachment

Board Agenda

MISCELLANEOUS COMMUNICATIONS

Settlement for Matter Entitled Pariente, Raphael Zapotitla v. County of Los Angeles, et al. Los Angeles Superior Court Case No. 22STCV07401.

Los Angeles County Contract Cities Liability Trust Fund Claims Board's recommendation: Authorized Settlement of the matter entitled **Pariente, Raphael Zapotitla v. County of Los Angeles, et al.** Los Angeles Superior Court Case No. 22STCV07401 in the amount of \$3,500,000 and instruct the Auditor-Controller to draw a warrant to implement this settlement from the Sheriff's Department Contract Cities Trust Fund's budget.

This lawsuit concerns allegations of an automobile accident involving a Sheriff's Deputy.

CASE SUMMARY

INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION

CASE NAME	Raphael Pariente Zapotitla vs. County of Los Angeles, et al.
CASE NUMBER	22STCV07401
COURT	Los Angeles Superior Court
DATE FILED	March 1, 2022
COUNTY DEPARTMENT	Sheriff's Department
PROPOSED SETTLEMENT AMOUNT	\$ 3,500,000
ATTORNEY FOR PLAINTIFF	Benny Khorsandi Esq.and Brian G. Beecher, Esq. Law Offices of Arash Khorsandi, PC
COUNTY COUNSEL ATTORNEY	LaTasha N. Corry, Esq. Deputy County Counsel
NATURE OF CASE	<p>In this lawsuit, Plaintiff claims a vehicle collision occurred on May 5, 2022, when a Deputy Sheriff rear-ended Plaintiff's vehicle causing injuries and damages.</p> <p>Due to the risks and uncertainties of litigation, a full and final settlement of the case is warranted.</p>
PAID ATTORNEY FEES, TO DATE	\$ 243,532
PAID COSTS, TO DATE	\$ 217,933



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:	May 5, 2021
Briefly provide a description of the incident/event:	<p>Summary Corrective Action Plan 2024-200</p> <p>Details in this document summarize the incident. The information provided is a culmination of various sources to provide an abstract of the incident.</p> <p>Based on multiple investigative reports, on May 5, 2021, at approximately 12:25 p.m., an on-duty Los Angeles County Sheriff deputy assigned to patrol at Lakewood Station, was driving a marked black and white patrol vehicle when he collided with the Plaintiff, who was stopped at a red-light intersection.</p> <p>The Los Angeles County Fire Department responded to the traffic collision. The Plaintiff was treated on scene for his injuries sustained in the traffic collision. The Plaintiff was transported to Lakewood Regional Medical Center for further medical treatment.</p> <p>Deputy One was not wearing a seatbelt and was not injured in the traffic collision.</p> <p>The patrol vehicle sustained major damage, and the Plaintiff's vehicle sustained moderate damage.</p> <p>A Sheriff Station field supervisor responded to the location and conducted a supervisor review and authored a Supervisor's Report of Incident or Damage to County Vehicle or Permittee's Vehicle report.</p> <p>A Lakewood Station traffic deputy conducted the traffic investigation and determined Deputy One was the cause of the collision due to driving at an unsafe speed for the conditions of the roadway.</p> <p>Deputy One's statement is based on the Supervisor's Report of Incident or Damage to County Vehicle:</p> <p>Deputy One stated he was traveling southbound on Clark Avenue approaching Palm Street in the city of Bellflower. He was reading the details of a call on his Mobile Digital Computer he was responding to. He was traveling approximately 25 mph, in the number 2 lane. He saw the Plaintiff stopping for a red light at the intersection. He applied the vehicle's brakes; however, he was unable to completely stop before colliding with the rear of the Plaintiff's vehicle.</p>

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

A **Department** root cause in this incident was Deputy One's unsafe speed prior to the collision.

A **Department** root cause in this incident was Deputy One's inattention to the road.

A **Non-associated** root cause in this incident was Deputy One's failure to utilize the vehicles safety belt.

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

Traffic Collision Investigation

The incident was investigated by representatives from the Lakewood Station Traffic Unit.

The collision investigation concluded the cause of the traffic collision was Deputy One was driving at an unsafe speed for traffic conditions, in violation of California Vehicle Code – 22350.

Administrative Investigation

This incident was investigated to determine if any administrative misconduct occurred before, during, or after this incident. The results of the investigation were presented for Department executive adjudication. Appropriate administrative action was taken.

The deputy involved in this incident received additional training pertaining to the circumstance surrounding this incident.

Traffic Collision Assessment and Review

Lakewood Station conducted a review and assessment of all traffic collisions for the calendar year 2020 through the end of 2024. The audit revealed there were 196 total collisions for this five-year period at the time of this plan, 129 of which were classified as preventable and 67 classified as non-preventable.

During the audit, it was discovered there was a spike in 2020, with a reduction in the following years. Personnel who have been involved in more than one traffic collision are directed to attend Department training, such as the Sheriffs Traffic Accident Reduction driving program, Emergency Vehicle Operations Course, and the Alternatives to Discipline Driving Course.

Sheriff Department Announcement - Department Wide Re-brief

The purpose of this re-brief 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.

“Mobile Eye” Collision Avoidance Systems

Communication Fleet Management has installed the Mobileye units in all new 2023 and newer black and white patrol vehicles for deployment countywide. Fleet Management equipped two Automatic License Plate Recognition black and white patrol vehicles at Palmdale Sheriff's Station last year as test vehicles.

County of Los Angeles
Summary Corrective Action Plan

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 Valdes A/Captain
Risk Management Bureau

Signature:

Date



04/25/2025

Name: (Department Head)

Myron Johnson, Assistant Sheriff
Patrol Operations

Signature:

Date



4/29/25

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: Betty Karmirlian (Risk Management Inspector General)

Signature:



Date: 5/1/2025