OFFICE OF THE
COUNTY
COUNSEL

November 4, 2025

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
Juan Marquez, et al. v. County of Los Angeles, et al.
United States District Court Case No. 2:22-cv-07246

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

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Board Agenda

MISCELLANEOUS COMMUNICATIONS

Los Angeles County Claims Board's recommendation: Authorize settlement of the matter entitled Juan Marquez, et al. v. County of Los Angeles, et al., United States District Court Case No. 2:22-cv-07246, in the amount of $4,500,000, and instruct the Auditor-Controller to draw a warrant to implement this settlement from the Sheriff's Department's budget.

This federal civil rights lawsuit arises from a non-fatal deputy-involved shooting of Plaintiff during an arrest/search warrant at Plaintiff's residence.

CASE SUMMARY

INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION

CASE NAME		Juan Marquez, et al. v. County of Los Angeles, et al.
CASE NUMBER		2:22-CV-07246
COURT		United States District Court
DATE FILED		October 4, 2022
COUNTY DEPARTMENT		Sheriff's Department
PROPOSED SETTLEMENT AMOUNT	$	4,500,000
ATTORNEY FOR PLAINTIFF		GREG L. KIRAKOSIAN Kirakosian Law, APC DALE K. GALIPO Law Offices of Dale K. Galipo
COUNTY COUNSEL ATTORNEY		RICHARD HSUEH Senior Deputy County Counsel
NATURE OF CASE		This is a recommendation to settle the federal lawsuit for disputed liability, filed by Juan Marquez arising out of the service of an arrest warrant on October 30, 2021, for a sum of $4,500,000, inclusive of attorneys' fees and costs. Due to the high risks and uncertainties of litigation, a reasonable settlement at this time will avoid further litigation costs. The full and final settlement of the case in the amount of $4,500,000 is recommended.
PAID ATTORNEY FEES, TO DATE	$	183,505
PAID COSTS, TO DATE	$	222,755

Case Name: Juan Marquez et. al. v. County of Los Angeles, et al.

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:	December 15, 2021, approximately 4:37 a.m.
Briefly provide a description of the incident/event:	Summary Corrective Action Plan 2023-160 Multiple investigative reports indicate on December 9, 2021, a detective at Norwalk Sheriff's Station sought and obtained a search and arrest warrant for the Plaintiff and his residence located in the city of Whittier. The arrest warrant was for the commission of an assault with a deadly weapon with a firearm. The search warrant was for the confiscation of all handguns located in the residence and associated with the Plaintiff. The warrant was classified as "high-risk" due to the number of automatic firearms and handguns anticipated to be in the residence, coupled with the nature of the crime the Plaintiff was suspected of having committed. The Los Angeles County Sheriff's Department (LASD) Special Enforcement Bureau's (SEB) Special Weapons Team was assigned to serve the arrest warrant and search warrant. On Monday, December 13, 2021, members of the SEB, were briefed by the detective about the Plaintiff's crime. They were provided basic information about the Plaintiff, shown his DMV photograph, and informed approximately 10 firearms, two of which were assault rifles, were registered to him. The SEB deputies were informed that Plaintiff's family members also lived in the residence. Deputies prepared an operations plan and briefing plan for the warrant service. On Wednesday, December 15, 2021, at approximately 3:00 a.m., the day the warrant was to be served, Deputies were briefed on the tactical plan, case information, and last-minute logistical needs and assignments. Three SEB paramedics were also assigned to the operation. Following the briefing, Deputies One and Two drove past the residence. They observed that lights were on inside the

	house and believed that someone was awake. The SEB team proceeded to the residence. At approximately 4:30 a.m., the team began to position themselves and surround the residence. Streetlights were on, which illuminated the front of the house, and a dim light illuminated the porch area. Deputy Four, who was positioned next to the large front window, signaled to the entry team that he saw multiple individuals asleep in the living room. The Sergeant verified that every team member was in position and signaled to Deputy Two to begin the "knock and notice" announcements, which were audio recorded. Several commands were heard demanding entry. Through the glass oval window on the door, Deputies saw a woman in the living room. Deputy Seven removed the front security screen door. The doorknob of the interior wooden door was locked. Deputy Four saw that the two male occupants, whom he had seen asleep on the couch, were up and covered in blankets. He announced in English and Spanish, "Police! It's the police! Show me your hands!" They looked at him through the window, but they did not raise their hands. Deputy One saw a female inside the living room had seen them, and he watched her talk to someone behind her while seemingly holding the door closed with her hands. She then returned to the door, acted like she was going to open it, and then backed up. Deputy Four saw the two male occupants briefly look around and then take off running within the residence. The Sergeant felt the team had been compromised and needed to make a forced entry. Deputy Five breached the door with the ram. A third male emerged from the hallway and into the living room area, followed by the Plaintiff. Deputy Five saw the Plaintiff standing approximately ten to fifteen feet in front of him, holding a black firearm with both hands above his waistline, pointed in his direction. Deputy Five took a step back to allow Deputies One and Two access to the house, and said, "gun."

	Deputy One could see one of the male occupants holding his hands up and the female on the ground, also displaying her hands. Deputy Two could see three to four males moving around in the living room. Deputies One and Two yelled, "Let me see your hands!" twice. Deputy One saw the Plaintiff's face and half of his body, standing in a shooting stance, and saw that he was "coming up with a black handgun." Deputy One saw the Plaintiff point the gun at Deputy Two. Deputy Two had also seen the Plaintiff raise a black handgun from his waistband and point it at his face. Deputy Two believed that he and Deputy One were going to be shot. After the first gunshot, Deputy Two saw the Plaintiff duck down behind the couch, poking his head up and down, while maintaining the gun pointing in his direction. The Plaintiff manipulated the gun as though it was jammed, "fidgeting with it" and appeared to be attempting to fire it. Deputy Two fired two rounds at the Plaintiff; one of the rounds struck the Plaintiff. Deputy Two advised the team that the Plaintiff was "down" and behind the couch. The deputies began to command the occupants to vacate the house. They walked out of the house and were escorted off the premises. The SEB entry team entered the residence with two paramedics; Deputies Eight and Nine. The team found the Plaintiff lying on his back on the kitchen floor, bleeding. A Smith and Wesson 9mm semi-automatic pistol, loaded with an 8-round magazine, was near the Plaintiff's feet. Deputy Ten saw the paramedic deputies, Deputies Eight and Nine, rendering aid and called the Fire Department for assistance. The Fire Department responded and transported the Plaintiff to a local hospital. As a result of his injury, the Plaintiff will require future medical care.

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

A **Department** root cause in this incident was the Deputies were involved in a deputy-involved shooting as they attempted to take the Plaintiff into custody.

A **non-Department** root cause in this incident was the Plaintiff's decision to point a firearm at the Deputy Sheriffs.

A **non-Department** root cause in this incident was the Plaintiff's and his family's failure to comply with the Deputies' lawful orders.

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

Criminal and Administrative Investigation
This incident was thoroughly investigated by the Sheriff's Department Homicide Bureau. The results of the investigation were submitted to the Los Angeles County District Attorney's Office, Justice System Integrity Division. The Los Angeles County District Attorney's Office concluded the investigation and found Deputies One and Two acted in lawful self-defense and defense of others when they used deadly force against the Plaintiff; they closed the file and would be taking no further action in this matter.

An administrative review was conducted and it was determined that the force and tactics used by the deputies were within department policy.

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, Acting Captain Risk Management Bureau	
Signature: JM Valdes	Date: 05/27/25

Name: (Department Head) Jason A. Skeen, Assistant Sheriff Countywide Operations	
Signature:	Date: 6/3/25

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: Betty Karmirlian	Date: 6/6/2025