



County of Los Angeles

March 3, 2026

Dawyn R. Harrison
County Counsel

Board of Supervisors

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Supervisor, First District

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Supervisor, Second District

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Supervisor, Third District

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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
Shannon Story v. County of Los Angeles, et al.
Los Angeles Superior Court Case No. 21AVCV00558**



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 Shannon Story v. County of Los Angeles, et al., Los Angeles Superior Court Case No. 21AVCV00558, in the amount of \$1,200,000, 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 deputy.

CASE SUMMARY

INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION

CASE NAME	Shannon Story v. County of Los Angeles, et al.
CASE NUMBER	21AVCV00558
COURT	Los Angeles Superior Court
DATE FILED	July 2, 2021
COUNTY DEPARTMENT	Sheriff
PROPOSED SETTLEMENT AMOUNT	\$ 1,200,000
ATTORNEY FOR PLAINTIFF	SANDY RABADI, ESQ. Law Offices of Sandy Rabadi
COUNTY COUNSEL ATTORNEY	KEVIN ENGELIEN Senior Deputy County Counsel
NATURE OF CASE	<p>This is an auto-liability lawsuit which arises from a traffic collision that occurred on October 27, 2019. Plaintiff claims she suffered injuries and damages as a result of the collision.</p> <p>Given the risks and uncertainties of litigation, a full and final settlement of the case is warranted.</p>
PAID ATTORNEY FEES, TO DATE	\$ 48,129
PAID COSTS, TO DATE	\$ 38,951

Case Name: Shannon Story 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:	October 27, 2019, at approximately 6:45 a.m.
Briefly provide a description of the incident/event:	<p>Summary Corrective Action Plan 2025-233</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>On Sunday, October 27, 2019, at approximately 6:45 a.m., an on-duty Los Angeles County Sheriff's Department Deputy Sheriff was driving a marked black and white patrol vehicle westbound on an avenue approaching the next street. As Deputy One was driving through the intersection, authorized Code-3, he was involved in a traffic collision.</p> <p>While driving, Deputy One was traveling westbound on the avenue in the number one lane at approximately 50 MPH. He entered the intersection against a red signal with the patrol vehicle's emergency lights and siren activated and collided into the passenger side of the Plaintiff's vehicle. Deputy One slowed to approximately 35MPH at the time of impact. The Plaintiff was traveling northbound on the street, in the number one lane, approaching the next avenue. The Plaintiff had a green signal and entered the intersection. The Plaintiff saw the patrol vehicle with the emergency lights on and heard the siren an instant before the collision.</p> <p>Deputy One indicated being injured due to the incident. Deputy One was transported by patrol vehicle to a medical center where he received medical treatment. The Plaintiff indicated being injured due to the incident as well. The Plaintiff was transported by her own accommodation to a different medical center where she received medical treatment.</p>

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

A **Department** root cause of this incident was Deputy One's failure to yield by entering the intersection in the path of the Plaintiff's vehicle, a violation of California Vehicle Code Section - 21800(a).

A **Department** root cause in this incident was Deputy One's failure to clear the intersection lane by lane.

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 Sheriff's Station Traffic Unit.

The collision investigation concluded Deputy One caused the collision as he failed to clear the intersection lane by lane and failure to yield to approaching traffic, in violation of California Vehicle Code Section - 21800(a).

Employee Risk Assessment and Review:

To assess the employee's performance and evaluate their future risk, an executive review of this incident coupled with a review of each incident coupled with a review of each incident in the involved employee's personnel history was conducted. The goal of this review is to determine if the employee's decision making in this incident, or in a pattern of incident, gives cause for the need to send them to additional training, have them assigned to a mentoring program, or if a re-assessment of their ability for duty is warranted. The captain of the station conducted a comprehensive review of the involved employee's personnel history including all shootings, use of force, civil claims, and complaints.

Based on the evaluation of Deputy One's performance; it was determined he was not working within the guidelines of what is expected from employees assigned to the Sheriff's Department. Deputy One received administrative discipline and additional training.

Station Traffic Collision Assessment and Review:

As a result of this collision, a review of employee traffic collisions from January 1, 2018, to December 31, 2024, was conducted. The audit revealed the following:

Calendar Year	Preventable Collisions	Non-Preventable Collisions
2018	26	11
2019	21	10
2020	22	18
2021	23	16
2022	9	10
2023	27	12
2024	22	11

The following is a table that shows personnel sent to Emergency Vehicle Operations Course (EVOC) and Alternative to Discipline Driving Class in the past three years in an effort to reduce traffic collisions:

Calendar Year	EVOC	Alternative to Discipline Driving Class
2022	36	4
2023	36	0
2024	103	5

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.

Emergency Vehicle Operation Course – Department Expanded Briefing:

To mitigate financial liability to the Department as a result of traffic collisions, representatives from Risk Management Bureau briefed the participants of Emergency Vehicle Operations Courses (EVOC) on current trends as they pertain to Department driving practices.

Department- Wide Broadcast Announcements- Sheriff’s Communication Center (SCC):

In an effort to mitigate the Department’s traffic collisions, Risk Management has partnered with SCC to create Department-Wide announcements.

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)

Tri Hoang, Captain
Risk Management Bureau

Signature:		Date:	10.7.25
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Name: (Department Head)

Myron Johnson, Assistant
Sheriff Patrol Operations

Signature:		Date:	10/9/25
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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 Karmirian (Risk Management Inspector General)

Signature:		Date:	10/14/25
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