



County of Los Angeles

March 3, 2026

Dawyn R. Harrison  
County Counsel

**Board of Supervisors**

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TO: JOSEPH M. NICCHITTA  
Acting Chief Executive Officer

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**  
**Antonio De La Cruz Zamora vs. County of Los Angeles, et al**  
**Los Angeles Superior Court Case No. 20STCV38123**  
**Freddy Ontiveros vs. County of Los Angeles, et al**  
**Los Angeles Superior Court Case No. 20STCV48053**



Attached is the Agenda entry for the Los Angeles County Contract Cities Liability Trust Fund Claims Board's recommendation in the above-referenced matters. 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:gb

Attachment

Board Agenda

MISCELLANEOUS COMMUNICATIONS

**Settlement for Matters Entitled: Antonio De La Cruz Zamora vs. County of Los Angeles, et al, Los Angeles Superior Court Case No. 20STCV38123 and Freddy Ontiveros vs. County of Los Angeles, et al, Los Angeles Superior Court Case No. 20STCV48053.**

Los Angeles County Contract Cities Liability Trust Fund Claims Board's recommendation: Authorize settlement of the consolidated case matters entitled Antonio De La Cruz Zamora vs. County of Los Angeles, et al, Los Angeles Superior Court Case No. 20STCV38123 and Freddy Ontiveros vs. County of Los Angeles, et al, Los Angeles Superior Court Case No. 20STCV48053, in the amount of \$1,750,000, 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	Consolidated Cases: Antonio De La Cruz Zamora vs. County of Los Angeles, et al. Freddy Ontiveros vs. County of Los Angeles, et al.
CASE NUMBER	20STCV38123 (Zamora) 20STCV48053 (Ontiveros)
COURT	Los Angeles Superior Court
DATE FILED	October 5, 2020 (Zamora) December 16, 2020 (Ontiveros)
COUNTY DEPARTMENT	Sheriff's
PROPOSED SETTLEMENT AMOUNT	\$ 1,750,000
ATTORNEY FOR PLAINTIFF	DEAN HAKKAK, ESQ. First Law Group HOVANES TATEVOSSIAN, ESQ. Law Offices of Hovanes Tatevossian
COUNTY COUNSEL ATTORNEY	KEVIN ENGELIEN, ESQ. Senior Deputy County Counsel
NATURE OF CASE	This lawsuit arises from a three car collision involving an on-duty patrol car on October 29, 2018. Plaintiffs allege they were injured and filed separate lawsuits that were later consolidated by the court. Due to the risks and uncertainties of litigation, a full and final settlement of the case is warranted.
PAID ATTORNEY FEES, TO DATE	\$ 40,434
PAID COSTS, TO DATE	\$ 79,856



## 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 29, 2018, approximately 6:19 p.m.
Briefly provide a description of the incident/event:	<p style="text-align: center;">Summary Corrective Action Plan 2024-198</p> <p>Based on multiple investigative reports, on October 29, 2018, at approximately 6:19 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 Plaintiff One's vehicle, that was stopped at a red-light. The impact of the collision caused Plaintiff One's vehicle to be pushed forward and rear-ended Plaintiff Two's vehicle.</p> <p>Deputy One was responding authorized Code-3, with lights and siren activated, to a robbery in-progress call.</p> <p>Deputy One was driving a marked black and white patrol vehicle southbound on Paramount Boulevard, in the City of Paramount. Deputy One observed traffic stopped for a red light at Somerset Boulevard. As he approached the intersection at Somerset Boulevard, travelling at approximately 75 miles per hour, he changed lanes to avoid the stopped traffic.</p> <p>A vehicle in his path caused him to again change lanes. However, his excessive speed caused him to collide and rear-end Plaintiff One's vehicle (sole occupant), which was stopped in front of him. Plaintiff One's vehicle was propelled forward, colliding with Plaintiff Two's vehicle (sole occupant, center lane).</p> <p>The Los Angeles County Fire Department responded to the traffic collision. Plaintiff's One and Two were treated on scene for their injuries sustained in the traffic collision, and subsequently transported to the hospital for further medical treatment.</p> <p>Deputy One was wearing a seatbelt at the time of the collision. He complained of pain and was transported to the hospital for further medical attention.</p> <p>The patrol vehicle and Plaintiff One's vehicle sustained major damage, while Plaintiff Two's vehicle sustained minor damage.</p> <p>A Lakewood Station field supervisor (sergeant) responded to the location and conducted a supervisory review of the collision. The sergeant interviewed Plaintiff One who complained of pain and was transported to the hospital for further medical treatment.</p> <p>Video surveillance obtained from the Paramount Sheriff Sub-Station corroborated the account of the incident by all involved parties.</p>

	A review of the Crash Data Retrieval (CDR) system found Deputy One was travelling 75 miles per hour southbound Paramount Boulevard and slowed to 35 miles per hour at the time of the collision.
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1. Briefly describe the **root cause(s)** of the claim/lawsuit:

A **Department** root cause in this incident was Deputy One's excessive speed prior to, and at the time of, the collision.

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 that the deputy sheriff caused the collision as he was driving at an unsafe speed for traffic conditions, in violation of California Vehicle Code Section 22350.

#### **Administrative Investigation**

This incident was investigated by representatives at Lakewood Station, to determine if any administrative misconduct occurred before, during, or after this incident. The results of the investigation were presented for Department executive adjudication.

Executive evaluation of this incident found some of Deputy One's actions were in violation of Department policy. Appropriate administrative action was taken.

Deputy One attended additional training pertaining the circumstances surrounding this incident.

#### **Traffic Collision Assessment**

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.

To improve employee safety and reduce the Department's liability and exposure, Lakewood supervisors continue to conduct bi-weekly briefings which focus on the importance of safe driving as well as abiding by all the rules of the road when operating county vehicles. As a result, preventable traffic collisions continue to decrease.

#### **Sheriff Department Announcement - Department Wide Re-brief**

Department personnel continue to be briefed 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.

#### **Department-Wide Broadcast Announcements—Sheriff's Communication Center (SCC)**

To mitigate the Department's traffic collisions, Risk Management has partnered with SCC to create Department-Wide announcements.

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 T. Hoang, Captain  
Risk Management Bureau

Signature:



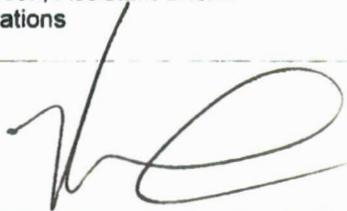
Date:

9/3/25

Name: (Department Head)

Myron Johnson, Assistant Sheriff  
Patrol Operations

Signature:



Date:

9/10/25

**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:

9/15/25