



County of Los Angeles

June 9, 2026

Dawyn R. Harrison
County Counsel

Board of Supervisors

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Supervisor, Second District


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Supervisor, Third District

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Supervisor, Fourth District

Kathryn Barger
Supervisor, Fifth District

TO: JOSEPH M. NICCHITTA
Interim 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
Heriberto Flores v. County of Los Angeles, et al.
Los Angeles Superior Court Case No. 24AVCV00490



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:as

Attachment

Board Agenda

MISCELLANEOUS COMMUNICATIONS

**Settlement for Matter Entitled Heriberto Flores v. County of Los Angeles, et al.
Los Angeles Superior Court Case No. 24AVCV00490**

Los Angeles County Contract Cities Liability Trust Fund Claims Board's recommendation:
Authorized Settlement of the matter entitled Heriberto Flores v. County of Los Angeles, et al.,
Los Angeles Superior Court Case No. 24AVCV00490 in the amount of \$675,000 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	Heriberto Flores vs. County of Los Angeles, et al.
CASE NUMBER	24AVCV00490
COURT	Los Angeles Superior Court
DATE FILED	April 24, 2024
COUNTY DEPARTMENT	Sheriff
PROPOSED SETTLEMENT AMOUNT	\$ 675,000
ATTORNEY FOR PLAINTIFF	SUNNY KHEHRA ESQ. Yagoubzadeh Law Firm
COUNTY COUNSEL ATTORNEY	JANET KEUPER, ESQ. Seki, Nishimura & Watase, PLC KEVIN ENGELIEN, ESQ. Senior Deputy County Counsel
NATURE OF CASE	This is an auto-liability lawsuit which arises from a traffic collision that occurred on July 9, 2023. Plaintiff claims he suffered injuries and damages as a result of the collision. Due to the risks and uncertainties of litigation, a full and final settlement of the case is warranted.
PAID ATTORNEY FEES, TO DATE	\$ 50,560
PAID COSTS, TO DATE	\$ 28,435



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:	July 9, 2023
Briefly provide a description of the incident/event:	<p style="text-align: center;">Summary Corrective Action Plan 2025-278</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 Sunday, July 9, 2023, at approximately 8:00 P.M., an on-duty Los Angeles County Deputy Sheriff, assigned to patrol, was driving a marked black and white patrol vehicle eastbound on a boulevard at the intersection of a promenade, when she was involved in a traffic collision.</p> <p>While driving, Deputy One made a right southbound turn at approximately 10 miles per hour into the promenade. As Deputy One turned the patrol vehicle she drove through an area with water that made the concrete surface slippery. Deputy One felt her vehicle lose traction with the road and collided with the Plaintiff's front driver's side bumper and fender of his vehicle. The Plaintiff was stopped at a red signal in the left turn lane at the intersection of the promenade when Deputy One collided into him.</p> <p>Deputy One was not injured. The Plaintiff complained of pain to his left arm but declined any medical evaluation by the Los Angeles County Fire Department. There were no passengers in the patrol vehicle, nor in the Plaintiff's vehicle.</p>

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

A **Department** root cause of this incident was Deputy One was traveling at an unsafe speed for the road conditions.

A **non-contributing Department** root cause in this incident was Deputy One unfastened her vehicle's factory installed seatbelt before she safely parked the vehicle.

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 Station Traffic Unit.

The collision investigation concluded Deputy One caused the collision by driving at an unsafe speed for the wet road conditions, in violation of California Vehicle Code Section 22350.

Administrative Investigation:

This incident was investigated by representatives from the patrol 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.

Appropriate administrative action was taken.

Since this incident, Deputy One has not been involved in any additional traffic collisions.

Traffic Collision Assessment and Review:

As a result of this collision, an assessment of employee involved traffic collisions from January 1, 2023, to January 1, 2026, was conducted. The audit revealed preventable collisions have decreased since 2023.

Personnel sent to Emergency Vehicle Operations Course (EVOC) and Alternative to Discipline Driving Class have increased in the past three years in an effort to reduce traffic collisions.

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.

Also, 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):


In hopes of mitigating Department traffic collisions, Risk Management Bureau has partnered with SCC (Sheriff's Communication Center) to create Department-Wide announcements which are conducted daily.

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: 2.8.26

Name: (Department Head)	
Ronald Kopperud, Chief North Patrol Division	
Signature: 	Date: 3-9-24

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)	
Roberto Chavez	
Signature:	Date: March 13, 2026