OFFICE OF THE
COUNTY
COUNSEL

# ADOPTED

BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

50 October 6, 2026

EDWARD YEN
EXECUTIVE OFFICER

**County of Los Angeles**

Dawyn R. Harrison
County Counsel

**Board of Supervisors**

Hilda L. Solis
Supervisor, First District

Holly Mitchell
Supervisor, Second District

Lindsey P. Horvath
Supervisor, Third District

Janice Hahn
Supervisor, Fourth District

Kathryn Barger
Supervisor, Fifth District

October 6, 2026

TO: EDWARD YEN
Executive Officer
Board of Supervisors

Attention: Agenda Preparation

FROM: LILIANA CAMPOS
Litigation Cost Manager

RE: **Item for the Board of Supervisors' Agenda**
**County Claims Board Recommendation**
**Carla Rodriguez v. Gerardo Marroquin, et al.**
**Los Angeles Superior Court Case No. 22STCV26508**

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.

LC:tf

Attachments



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Board Agenda

MISCELLANEOUS COMMUNICATIONS

Los Angeles County Claims Board's recommendation: Authorize settlement of the matter entitled Carla Rodriguez v. Gerardo Marroquin, et al., Los Angeles Superior Court Case No. 22STCV26508, in the amount of $5,000,000, and instruct the Auditor-Controller to draw a warrant to implement this settlement from the Sheriff's Department's budget.

This lawsuit arises from alleged injuries Plaintiff sustained in a traffic collision involving a Sheriff's Department employee.

## CASE SUMMARY

## INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION

| | | |
|---|---|---|
| CASE NAME | | Carla Rodriguez vs. Gerardo Marroquin, et al. |
| CASE NUMBER | | 22STCV26508 |
| COURT | | Los Angeles Superior Court |
| DATE FILED | | August 16, 2022 |
| COUNTY DEPARTMENT | | Sheriff |
| PROPOSED SETTLEMENT AMOUNT | $ | 5,000,000 |
| ATTORNEY FOR PLAINTIFF | | DENIS ALEXANDROFF, ESQ.<br>Law Offices of Denis Alexandroff |
| COUNTY COUNSEL ATTORNEY | | LATASHA N. CORRY<br>Deputy County Counsel |
| NATURE OF CASE | | This is an auto-liability lawsuit which arises from a traffic collision that occurred on May 12, 2022. Plaintiff claims she suffered injuries and damages as a result of the collision.<br><br>Given the risks and uncertainties of litigation, a full and final settlement of the case is warranted. |
| PAID ATTORNEY FEES, TO DATE | $ | 91,799 |
| PAID COSTS, TO DATE | $ | 138,798 |

Case Name: Rodriguez, Carla v. County of Los Angeles

# 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 12, 2022 |
| Briefly provide a description of the incident/event: | Summary Corrective Action Plan<br><br>On May 12, 2022, at approximately 1:20 PM, an on-duty Los Angeles County Deputy Sheriff was driving a department issued unmarked vehicle eastbound on State Route 2 (Glendale Freeway) near State Route 134 (Ventura Freeway) in Los Angeles, when they were involved in a traffic collision.<br><br>The deputy was traveling in the #1 lane at up to 81 miles per hour in a 65 miles per hour zone. Ahead, a large Cal Trans truck was at the rear of a cleaning convoy. The deputy believed the truck was fully in the shoulder and that the truck could be safely passed. As the deputy approached, however, they realized at least a portion of the truck was in the # 1 lane. The deputy applied their brakes and veered to the right but was unable to avoid a collision with the rear attenuator attached to the truck.<br><br>The California Highway Patrol (CHP) responded to the incident and conducted a traffic crash report. Their investigation determined the deputy to be primarily at fault. Specifically, they determined the deputy violated California Vehicle Code §22350 – Speed Limit. |

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

The following departmental root cause was identified:

- The deputy operating their vehicle in an unsafe manner – specifically, operating their vehicle at a speed above the posted speed limit.

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

1). Employee review – The involved employees and incident were thoroughly reviewed by department executives.

2) Traffic Collision Investigation – Both CHP and the department investigated the cause of the traffic collision.

3) 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 review. Appropriate administrative action was taken.

4) Training – Driver training was provided to the involved deputy.

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

| Name: (Risk Management Coordinator)<br><br>Brian A. Tolmasoff, Commander<br>Custody Services Division – Specialized Programs | |
|---|---|
| Signature: | Date: 6-18-2026 |

| Name: (Department Head)<br><br>Tania E. Plunkett, Chief<br>Custody Services Division – Specialized Programs | |
|---|---|
| Signature: | Date: 6-18-26 |

**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)<br>Betty Karmirlian | |
|---|---|
| Signature: Betty Karmirlian | Date: 7/9/26 |