



COUNTY OF LOS ANGELES  
CLAIMS BOARD  
500 WEST TEMPLE STREET  
LOS ANGELES, CALIFORNIA 90012-2713

MEMBERS OF THE BOARD

Oscar Valdez  
Chief Deputy, Auditor-Controller  
Steve Robles  
Chief Executive Office  
Adrienne M. Byers  
Office of the County Counsel

NOTICE OF MEETING

The Los Angeles County Claims Board will hold a regular meeting on **Monday, September 19, 2022, at 9:30 a.m.**, via online conference call. Members of the public who would like to listen to the open sessions of the meeting may call (323) 776-6996, then enter ID 834 482 561#, at 9:30 a.m. on September 19, 2022.

**Reports of actions taken in Closed Session.** The Los Angeles County Claims Board will report actions taken on any Closed Session Items on Monday, September 19, 2022 at 12:10 p.m. Members of the public who would like to hear reportable actions taken on any Closed Session items may call (323) 776-6996, then enter ID 834 482 561#, at 12:05 p.m. on September 19, 2022. Please note that this time is an approximate start time and there may be a short delay before the Closed Session is concluded and the actions can be reported.

**TO PROVIDE PUBLIC COMMENT:**

You may submit written public comments by e-mail to [claimsboard@counsel.lacounty.gov](mailto:claimsboard@counsel.lacounty.gov) or by mail to: Attention: Los Angeles County Claims Board, Executive Office, County Counsel, 500 W. Temple St., Los Angeles, CA, 90012.

Written public comment or documentation must be submitted no later than 12 p.m. on Friday, September 16, 2022. Please include the Agenda item and meeting date in your correspondence. Comments and any other written submissions will become part of the official record of the meeting.

**SUPPORTING DOCUMENTATION:** Any supporting documents will be posted and can be provided upon request. Please submit requests for supporting documents to [claimsboard@counsel.lacounty.gov](mailto:claimsboard@counsel.lacounty.gov).

If you would like more information, please contact Claims Board Secretary Derek Stane at [dstane@counsel.lacounty.gov](mailto:dstane@counsel.lacounty.gov).

## AGENDA

1. Call to Order.
2. Opportunity for members of the public to address the Claims Board on items of interest that are within the subject matter jurisdiction of the Claims Board.
3. Closed Session – Conference with Legal Counsel – Existing Litigation (Subdivision [a] of Government Code Section 54956.9).

- a. Jullian Cassianis v. County of Los Angeles, et al.  
Los Angeles Superior Court Case Number 18STCV04340

This medical malpractice lawsuit against the Department of Health Services alleges that Harbor-UCLA Medical Center delayed providing care to plaintiff; settlement is recommended in the amount of \$4,000,000.

- b. Stacy Boyce v. County of Los Angeles, et al.  
Los Angeles Superior Court Case No. 20STCV2187

This lawsuit arises from alleged injuries plaintiff sustained in an automobile accident involving an Internal Services Department employee; settlement is recommended in the amount of \$500,000.

[See Supporting Documents](#)

- c. Rebecca Monges v. County of Los Angeles, et al.  
Los Angeles Superior Court Case No. 20STCV43282

This lawsuit arises from alleged injuries plaintiff sustained in an automobile accident involving a Sheriff's Department employee; settlement is recommended in the amount of \$100,000.

[See Supporting Document](#)

- d. Richard Escarcega v. Steven Martinez, et al.  
United States District Court Case No. 2:21-CV-06155

This federal civil rights lawsuit alleges plaintiff was unlawfully detained and subjected to excessive force while being detained by Sheriff's Department deputies; settlement is recommended in the amount of \$135,000.

[See Supporting Documents](#)

- e. Yolanda Sanchez, et al. v. County of Los Angeles, et al.  
United States District Court Case No. 2:20-CV-01146

This wrongful death lawsuit arises from the death of plaintiff's son, who died while in the custody of the Sheriff's Department; settlement is recommended in the amount of \$850,000.

[See Supporting Documents](#)

- f. Pablo Unzueta v. County of Los Angeles, et al.  
United States District Court Case No. 21-CV-8378

This federal civil rights lawsuit alleges plaintiff was wrongfully searched, arrested, and had his property seized by Sheriff's Department deputies; settlement is recommended in the amount of \$90,000.

[See Supporting Document](#)

- g. Rufino Paredes v. County of Los Angeles, et al.  
United States District Court Case No. 21-CV-02644

This wrongful death lawsuit alleges federal civil rights violations, denial of medical care, and negligence arising from the death of plaintiff's son while in the custody of the Sheriff's Department; settlement is recommended in the amount of \$1,900,000.

[See Supporting Documents](#)

- h. Elisa Guardado, et al. v. County of Los Angeles, et al.  
Los Angeles Superior Court Case No. 20STV33203

This wrongful death lawsuit arises from the death of plaintiff's son, who was fatally shot by a Sheriff's deputy in an unincorporated area near the City of Gardena; settlement is recommended in the amount of \$8,000,000.

[See Supporting Documents](#)

- i. Victor Avalos, et al. v. County of Los Angeles, et al.  
Los Angeles Superior Court Case No. 19STCV27032

This wrongful death lawsuit alleges civil rights violations, fraud, and negligence against the Department of Children and Family Services arising out of the death of a minor; settlement is recommended in the amount of \$32,000,000.

[See Supporting Documents](#)

- j. Ardath Broderick v. Los Angeles County Probation Department  
Los Angeles Superior Court Case. No. BC708080

This lawsuit concerns allegations that an employee of the Probation Department was subjected to disability discrimination, harassment, and retaliation; settlement is recommended in the amount of \$100,000.

- k. Vince Latkins v. County of Los Angeles  
Los Angeles Superior Court No. 19STCV41486

This lawsuit concerns allegations that an employee of the Assessor's Office was subjected to disability discrimination, harassment, and retaliation; settlement is recommended in the amount of \$150,000.

- 4. Approval of the minutes of the August 15, 2022, regular meeting of the Claims Board.

[See Supporting Document](#)

- 5. Adjournment.

## **CASE SUMMARY**

### **INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION**

CASE NAME	Stacy Boyce v. County of Los Angeles, et al.
CASE NUMBER	20STCV21871
COURT	Los Angeles Superior Court
DATE FILED	June 10, 2020
COUNTY DEPARTMENT	Internal Services Department
PROPOSED SETTLEMENT AMOUNT	\$ 500,000
ATTORNEY FOR PLAINTIFF	STEVEN L. MAZZA Carpenter, Zuckerman & Rowley BENJAMIN G. BERKLEY Law Offices of Stuart Berkley
COUNTY COUNSEL ATTORNEY	DAVID LEE Deputy County Counsel
NATURE OF CASE	This is a motor vehicle accident lawsuit that occurred on December 18, 2018, when an Internal Services Department car rear-ended Plaintiff's car at an intersection. Plaintiff claims to have suffered personal injuries as a result. Due to the risks and uncertainties of litigation, a full and final settlement of the case is warranted.
PAID ATTORNEY FEES, TO DATE	\$ 65,118
PAID COSTS, TO DATE	\$ 4,517

Case Name: Stacy Boyce 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 18, 2018
Briefly provide a description of the incident/event:	<p>The plaintiff was rear-ended in a vehicle accident with an ISD employee/defendant at traffic light in Norwalk, CA. Both parties contacted law enforcement/911 and a Sheriff Deputy from the Norwalk Station arrived on the scene. The Deputy did not complete a police report as no medical attention was needed.</p> <p>There were no witnesses to the accident. Both parties took pictures and exchanged contact/insurance information and left the scene.</p> <p>Subsequently, on June 10, 2020, the plaintiff filed suit against the County and the employee (defendants) claiming negligence on two (2) causes of action. The plaintiff claimed that they sustained injuries to their neck and back, which are still present today.</p>

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

- 1) Based on accident/incident statements, the Department's Vehicle Accident Review Committee determined that this accident was "Preventable," as the employee/defendant was following the plaintiff's vehicle too closely not leaving enough time to stop.

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

- 1) The employee was scheduled and completed a Defensive Driving Training (June 19, 2019). This training contained in class and behind the wheel courses.
- 2) On February 15, 2022, the employee was issued an administrative (corrective) action.

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)	
Signature: <i>Bryce M. Tyler</i>	Date: 6.15.2022

Name: (Department Head)	
Signature: <i>Debra Hall</i>	Date: 6-28-22

<b>Chief Executive Office Risk Management Inspector General USE ONLY</b>	
Are the corrective actions applicable to other departments within the County?	
<input checked="" type="checkbox"/> Yes, the corrective actions potentially have County-wide applicability.	
<input type="checkbox"/> No, the corrective actions are applicable only to this department.	
Name: (Risk Management Inspector General)	
Destiny Castro	
Signature: <i>Destiny Castro</i>	Date: 06/28/2022

## **CASE SUMMARY**

### **INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION**

CASE NAME	Rebecca Monges v. County of Los Angeles, et al.
CASE NUMBER	20STCV43282
COURT	Los Angeles Superior Court
DATE FILED	November 12, 2020
COUNTY DEPARTMENT	Sheriff's Department
PROPOSED SETTLEMENT AMOUNT	\$ 100,000
ATTORNEY FOR PLAINTIFF	Darren Antony RMD Law, LLP
COUNTY COUNSEL ATTORNEY	Richard K. Kudo Principal Deputy County Counsel
NATURE OF CASE	This Sheriff's Department automobile accident lawsuit arose when plaintiff Rebecca Monges was injured after a Deputy Sheriff lost control of his Sheriff's Department radio car and collided into the minivan in which plaintiff was a passenger. The collision occurred on the US-101 freeway near the I-405 interchange. Plaintiff claims to have suffered injuries and damages from the accident. Due to the risks and uncertainties of litigation, a full and final settlement of the case is warranted.
PAID ATTORNEY FEES, TO DATE	\$ 46,121
PAID COSTS, TO DATE	\$ 12,376



## CASE SUMMARY

### INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION

CASE NAME	Richard Escarcega v. Steven Martinez, et al.
CASE NUMBER	2:21-CV-06155
COURT	United States District Court
DATE FILED	July 30, 2021
COUNTY DEPARTMENT	Sheriff's Department
PROPOSED SETTLEMENT AMOUNT	\$ 135,000
ATTORNEY FOR PLAINTIFF	Darrell J. York, Esq.
COUNTY COUNSEL ATTORNEY	Minas Samuelian Deputy County Counsel
NATURE OF CASE	<p>This is a recommendation to settle for \$135,000 inclusive of attorneys' fees and costs, a federal civil rights lawsuit filed by Richard Escarcega ("plaintiff"), alleging excessive force and unlawful arrest arising out of plaintiff's detention and arrest.</p> <p>Given 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 \$135,000 is recommended.</p>
PAID ATTORNEY FEES, TO DATE	\$ 23,463
PAID COSTS, TO DATE	\$ 5,822



## 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 31, 2019, at approximately 11:30 p.m.
Briefly provide a description of the incident/event:	<p><b><u>Escarcega, Richard v. County of Los Angeles, et al.</u></b> Summary Corrective Action Plan 2022-20</p> <p>On July 31, 2019, at approximately 11:30 p.m., two Los Angeles County Sheriff's Department deputy sheriffs assigned to East Los Angeles Station were patrolling together as a two-man unit, in a marked black and white patrol vehicle. The deputy sheriffs were on City Terrace Drive in the unincorporated Los Angeles County area of East Los Angeles.</p> <p>As the deputy sheriffs traveled west on City Terrace Drive, they saw the Plaintiff walking eastbound on the sidewalk near 4140 City Terrace Drive.</p> <p>The Plaintiff allegedly was walking with an unsteady gait, losing his footing at times. The first deputy sheriffs (driver) made a U-turn and stopped adjacent to the Plaintiff. Both deputy sheriffs exited their vehicle and contacted the Plaintiff to determine if he was under the influence of a narcotic or alcohol.</p> <p>The second deputy sheriff (passenger) contacted the Plaintiff. The second deputy sheriff asked the Plaintiff if he was on parole and had anything illegal in his possession. The Plaintiff said, "No." Both deputy sheriffs noticed that the Plaintiff was sweating profusely despite the night being slightly cold, his pupils appeared dilated, his speech was rapid, and he had difficulty remaining still. Based on both deputy sheriff's observations, they formed an opinion the Plaintiff displayed objective signs consistent with being under the influence of a controlled substance. The deputy sheriffs detained the Plaintiff pending an under the influence investigation.</p> <p>During the investigation the deputy sheriffs observed multiple tattoos on the Plaintiff's arms and face (a unique tattoos depicting three dot tattoos with two parallel lines directly underneath the dots).</p> <p><b>Note:</b> The deputy sheriffs noted in their report: Based on their training and experience in field of criminal street gangs, they recognized the tattoo on the Plaintiff, as one common amongst southern Hispanic criminal street gang.</p> <p>While talking to the Plaintiff, the second deputy sheriff noticed the Plaintiff was wearing a baggy grey shirt and oversized basketball shorts. The second deputy sheriff also saw a prominent bulge on the right side of his waistband, which he believed was a weapon.</p> <p>The second deputy attempted to detain the Plaintiff to conduct a pat-down search safely; however, the Plaintiff resisted by swinging his arms away. The Plaintiff pushed the second deputy and took a fighting stance while</p>

	<p>reaching towards his waistband. Both deputy sheriffs attempted to de-escalate the situation by ordering the Plaintiff to place his hands behind his back; however, he refused.</p> <p>Fearing the Plaintiff was about to arm himself; the second deputy sheriff punched the Plaintiff five to six times in the face with his fist, which were ineffective. The first deputy sheriff broadcast via his Sheriff's Department handheld radio, they were in a fight and needed assistance.</p> <p>The Plaintiff continued to resist by "thrashing" his body from side to side while ignoring the second deputy sheriff's commands to stop fighting and stop reaching for his waistband. The Plaintiff dropped to his knees while continuing to reach for his waistband. The second deputy again punched the Plaintiff in the face to stop him from reaching into his waistband. However, the strikes to the Plaintiff's face still had no effect and he continued to resist.</p> <p>While on the ground, both deputy sheriffs positioned their bodies on top of the Plaintiff. Both deputy sheriffs utilized their combined body weight to hold down the Plaintiff while they continued to struggle to handcuff him. Due to the strikes to the Plaintiff's face being an ineffective force tactic, the second deputy reassessed and advised the Plaintiff he would spray him with Oleoresin Capsicum spray (OC spray). The Plaintiff continued to resist; the second deputy sheriff sprayed one burst of OC spray in the Plaintiff's face. This defensive tactic was adequate and the deputy sheriffs were able to handcuff the Plaintiff.</p> <p>Despite being handcuffed, the Plaintiff continued to reach for his waistband. The Plaintiff was able to use his handcuffed left hand to grab ahold of the first deputy sheriff's right thumb. The Plaintiff violently kicked his legs, prompting the first deputy sheriff to straddle his legs, muting the Plaintiff's efforts to kick. The Plaintiff eventually stopped fighting and resisting. The first deputy sheriff searched the Plaintiff's person and found a nine-inch knife in his waistband.</p> <p>Additional East Los Angeles Station deputy sheriffs and the field sergeant arrived on scene.</p> <p>As a precautionary measure, the assisting deputy sheriffs hobbled the Plaintiff's legs to prevent him from kicking the deputy sheriffs or paramedics. The first deputy sheriff also recovered a clear glass pipe from the Plaintiff's left shorts pockets with a bulbous end. The glass pipe contained a white, crystal-like residue which resembled methamphetamine. Additionally, the Plaintiff was found to be in possession of a clear baggie containing a crystal-like substance resembling methamphetamine.</p> <p>The Plaintiff was placed under arrest for Resist/Obstructed Arrest, 69 Penal Code; Possession of Concealed Dirk/Dagger on Person, 21310 Penal Code; Possession of Controlled Substance (Methamphetamine), 11377 (a) Penal Code; and Possession of Drug Paraphernalia, 11364 (a) Health and Safety Code.</p> <p>The Plaintiff was treated on scene by Los Angeles County Fire Department for his injuries. Then two uninvolved deputy sheriffs escorted the Plaintiff who was transported to the hospital via ambulance, where he was treated for his injuries.</p>
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	<p>The doctor also, opined that the Plaintiff appeared to be “high on drugs,” as evidenced by his behavior, indicative of a person under the influence of a stimulant (Methamphetamine). After, cleared by the doctor, the Plaintiff was transported to East Los Angeles Station for booking.</p> <p>The first and second deputy sheriffs suffered injuries as a result of the incident. Both were medical evaluated and treated.</p> <p>Internal Affairs Bureau (IAB) investigators responded to East Los Angeles Station to investigate the use of force incident. The IAB investigators conducted interviews with the Plaintiff and all involved deputy sheriffs. During the investigation, the IAB investigators interviewed witnesses, surveyed the location of the use of force, and obtained video surveillance of the use of force incident.</p> <p>On August 1, 2019, East Los Angeles Station detectives were assigned the criminal investigation. The station detective interviewed the Plaintiff and collected reports and evidence. The station detective completed the criminal case file and presented the criminal case to the District Attorney for filing.</p> <p>On August 5, 2019, the Los Angeles County District Attorney’s Office reviewed the case and filed one felony charge of Resisting an Executive Officer, 69 P.C., one felony charge of Carrying a Concealed Dirk or Dagger, 21310 P.C., and a Misdemeanor charge of Possession of Drug Paraphernalia, 11364 H.S.</p> <p>On October 9, 2019, after his preliminary hearing, the charges for possession of the knife and resisting arrest were both reduced to misdemeanors by the court. The charge for possession of drug paraphernalia was dismissed. The Plaintiff was released on his own recognizance.</p> <p>The Plaintiff’s defense team acquired video surveillance in front of the business where the deputy sheriffs detained the Plaintiff. The Plaintiff alleged the video showed him walking in a normal manner and looking at his cellular phone. The Plaintiff alleged he was not staggering or walking with an unsteady gait. The Plaintiff’s defense team provided the video footage to the District Attorney’s Office.</p> <p>On December 3, 2020, with a motion to suppress pending, the Los Angeles County District Attorney’s Office dismissed all charges in the case.</p>
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1. Briefly describe the **root cause(s)** of the claim/lawsuit:

A **Department** root cause in this incident was the deputy used personal weapons (fists) during the use of force against the Plaintiff, which caused a fracture to his jaw.

A **Department** root cause in this incident was the station detective could have expanded the search for video surveillance to capture the Plaintiff’s actions prior to contact with deputy sheriffs.

A **Department** root cause in this incident was the deputies did not have equipment (Body-Worn Camera) to video record their contact with the Plaintiff in order to prove or disprove his allegations.

A **non-Department** root cause in this incident was the Plaintiff's failure to comply/cooperate with Los Angeles County deputy sheriffs. Instead of comply/cooperate, the Plaintiff fought with deputy sheriffs to avoid being searched and/or arrested.

A **non-Department** root cause in this incident was the Plaintiff's possession of a 9" knife concealed in his waistband.

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

**Administrative Investigation**

This incident was investigated by representatives of the Sheriff's Department Internal Affairs Bureau to determine if any administrative misconduct occurred before, during or after this incident.

The results of the investigation were presented to the Executive Force Review Committee (EFRC) for adjudication. On June 25, 2020, the EFRC determined that the force and tactics used against the Plaintiff were within Department Policy.

**Tactical Debriefing**

In the days following the incident, personnel were briefed on the events known at the time of the incident to all sworn East Los Angeles Station personnel. Emphasis was placed on officer safety, tactical preparedness, force options, and lessons learned to assist employees for future situations similar in nature.

Briefings occurred on all shifts and were given by the captain of East Los Angeles Station.

**Crime Scene Investigations**

The supervisors at East Los Angeles Station conducted a briefing on each shift to discuss crime scene investigations. The premise was to remind personnel about broadening the scope of investigations. The collection of crime scene evidence, area surveillance videos, and interviewing witnesses was re-briefed to the patrol deputy sheriffs, field sergeants, and station detectives.

The station detective sergeants also discussed follow-up procedures after criminal incidents to present sufficient evidence for a case file. Additionally, the sergeants discussed follow-up with the District Attorney's Office when particular cases get dismissed and charges are dropped.

**Station Body Worn Cameras**

(Ongoing, Body Worn Camera Unit, Station Training and Scheduling Staff):

Since the incident, Department policy 3-06/200.00, Body Worn Camera was implemented, and Department personnel are required to wear and activate their respective Body Worn Cameras when collecting evidence in criminal investigations and law enforcement interaction with the public.

East Los Angeles Station Body Worn Cameras were issued starting on November 10, 2020, and East Los Angeles Station personnel also received training.

East Los Angeles Station supervisors have been conducting re-current briefings to all personnel in the use of the Body Worn Cameras.

3. Are the corrective actions addressing Department-wide system issues?

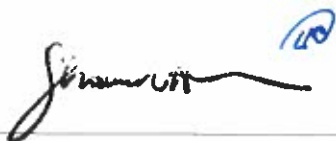
- ☐ Yes – The corrective actions address Department-wide system issues.  
☒ No – The corrective actions are only applicable to the affected parties.

Los Angeles County Sheriff's Department

Name: (Risk Management Coordinator)

Shawnee N. Hinchman, A/Captain  
Risk Management Bureau

Signature:



Date:

6/15/22

Name: (Department Head)

Edwin E. Alvarez, Chief  
Professional Standards Division

Signature:



Date:

6/21/22

**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)

Destiny Castro

Signature:



Date:

06/27/2022

## CASE SUMMARY

### INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION

CASE NAME	Sanchez, Yolanda, et al. v. County of Los Angeles, et al.
CASE NUMBER	2:20-CV-01146
COURT	United States District Court
DATE FILED	February 4, 2020
COUNTY DEPARTMENT	Sheriff's Department
PROPOSED SETTLEMENT AMOUNT	\$ 850,000
ATTORNEY FOR PLAINTIFF	Justin E. Sterling & Erin Darling
COUNTY COUNSEL ATTORNEY	Minas Samuelian Deputy County Counsel
NATURE OF CASE	<p>This is a recommendation to settle for \$850,000, inclusive of attorneys' fees and costs, a lawsuit filed by the mother and minor child of Nicholas Sanchez against the County alleging federal civil rights violations and wrongful death following the in-custody death of Mr. Sanchez.</p> <p>Given 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 \$850,000 is recommended.</p>
PAID ATTORNEY FEES, TO DATE	\$ 153,790
PAID COSTS, TO DATE	\$ 12,475

**Case Name:**

Yolanda Sanchez v. County of Los Angeles, et al.

County of Los Angeles

Summary Corrective Action Plan



## 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:	January 2, 2019
Briefly provide a description of the incident/event:	Plaintiff (decedent's mother) alleges that the Sheriff's Department failed to protect her son, who was discovered dead in his cell at Men's Central Jail (MCJ) due to drug toxicity.

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

- A Departmental root cause in this incident was possible criminal misconduct by LASD personnel.
- A Departmental root cause in this incident was the availability of contraband within MCJ.

2. Briefly describe recommended corrective actions:

(Include each corrective action, due date, responsible party, and any disciplinary actions if appropriate)

- Criminal Investigation – A criminal investigation was opened into the actions of Department members accused of facilitating the movement and availability of contraband. At the time this Summary Corrective Action Plan was prepared the investigations had been submitted to the Los Angeles District Attorney's office for filing consideration.
- Targeted K-9 Searches – The Department redeployed existing K-9 search teams to perform more targeted searches in coordination with Men's Central Jail management.
- Workplace Monitoring and Training – The Department has briefed supervisors on the importance of conducting unannounced visits to housing areas to monitor and supervise their staff.
- Clear Personal Bag Policy Briefing – The Department has briefed all custody personnel on the clear personal bag policy, designed to reduce the introduction of contraband into the jail system.
- Operation Safe Jails Movement Oversight – The Department now requires movement conducted by Operation Safe Jails deputies to be reported to a supervisor for additional oversight and monitoring.



**Case Name:**Yolanda Sanchez v. County of Los Angeles, et al.

County of Los Angeles

Summary Corrective Action Plan

Name: (Risk Management Coordinator)  
Commander Tania E. Plunkett

Signature:



Date:

7-12-22

Name: (Department Head)  
Chief Sergio A. Aloma

Signature:



Date:

7/14/22

**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)  
Destiny Castro

Signature:



Date:

08/18/2022

## CASE SUMMARY

### INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION

CASE NAME	Pablo Unzueta v. County of Los Angeles, et al.
CASE NUMBER	21-cv-8378-AB-AGRx
COURT	United States District Court
DATE FILED	October 22, 2021
COUNTY DEPARTMENT	Sheriff's Department
PROPOSED SETTLEMENT AMOUNT	\$ 90,000
ATTORNEY FOR PLAINTIFF	Susan E. Seager, Esquire Jack Lerner, Esquire
COUNTY COUNSEL ATTORNEY	Lana Choi, Senior Deputy County Counsel
NATURE OF CASE	This is a request to settle for \$90,000, inclusive of attorney's fees and costs, the lawsuit brought against the County, Sheriff Alex Villanueva, and Does 1-10 by plaintiff Pablo Unzueta. Plaintiff seeks damages arising from a September 8, 2020 incident during which he alleges he was wrongfully searched, arrested, and had his property wrongfully seized by Los Angeles County Sheriff's Department ("LASD") deputies during the September 2020 protests regarding deputy-involved shootings.
PAID ATTORNEY FEES, TO DATE	\$ 23,069
PAID COSTS, TO DATE	\$ 0

## **CASE SUMMARY**

### **INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION**

CASE NAME	Paredes, Rufino, et al. v. County of Los Angeles, et al.
CASE NUMBER	21-CV-02644
COURT	United States District Court
DATE FILED	March 9, 2021
COUNTY DEPARTMENT	Sheriff's Department
PROPOSED SETTLEMENT AMOUNT	\$ 1,900,000
ATTORNEY FOR PLAINTIFF	Steward J. Powell, Esq.
COUNTY COUNSEL ATTORNEY	Millicent L. Rolon, Principal Deputy County Counsel
NATURE OF CASE	<p>This is a recommendation to settle for \$1,900,000, inclusive of attorneys' fees and costs, a wrongful death and federal civil rights lawsuit filed by decedent Rufino Paredes' mother, and five minor children, by and through their guardians ad litem, following the in-custody death of Mr. Paredes.</p> <p>Given the 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 \$1,900,000 is recommended.</p>
PAID ATTORNEY FEES, TO DATE	\$ 33,889
PAID COSTS, TO DATE	\$ 14,328



## 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:	November 29 - 30, 2018
Briefly provide a description of the incident/event:	<p><b><u>Rufino Paredes v. County of Los Angeles</u></b> Summary Corrective Action Plan 2022-18</p> <p>On Thursday, November 29, 2018, at approximately 9:44 p.m., two Los Angeles County Sheriff's Department deputy sheriffs assigned to Industry Station, working as a two-person unit, responded to a vehicle theft in progress call for service at 16218 Central Avenue, La Puente, CA 91744.</p> <p>As the deputies arrived at the location, they observed the described male Hispanic (the decedent) seated in the driver's seat of the vehicle (2004, Honda, License #7NPB127, green in color) in the call. The deputies noticed the front driver-side window and the rear driver-side passenger window were shattered. Also, the deputies saw the decedent leaning forward toward the ignition and appeared to be attempting to start the car with an unknown object in his hand.</p> <p>The decedent was detained pending a grand theft auto investigation. At the conclusion of the investigation, it was determined the decedent did not own the vehicle nor was he given permission to be in the vehicle. It should be noted the unknown object in the decedent's hand was an altered "shaved" key.</p> <p>Based on the deputies' grand theft investigation and the vehicle owner statement, the decedent was arrested for Felony Grand Theft Auto, 487(d) California Penal Code and Misdemeanor Possession of Burglary Tools, 466 California Penal Code.</p> <p>The decedent was arrested without incident and mirandized while seated in the back seat of the deputies' patrol vehicle. The decedent said he understood his rights and stated, "I have nothing to talk about, I don't know what's going on."</p> <p>As the decedent sat in the backseat of the patrol vehicle, his mother arrived at the scene. Deputy one heard the decedent's mother stating aloud, the decedent had a drug problem and she did not know why he would act in such a manner. At no time did deputy one hear the decedent's mother say he suffered from mental illness or had suicidal ideations.</p> <p>The deputies completed their investigation and transported the decedent to Industry Station where he was booked for the indicated charges. The decedent remained silent with his head down while being driven to the station.</p>

	<p><b>Note:</b> The Industry Station Jail is classified as a Type I facility, used for the detention of inmates, usually pending arraignment, for not more than 96 hours after booking, excluding holidays and weekends.</p> <p>At approximately 10:03 p.m., the decedent arrived at Industry Station Jail for booking and temporary housing. During the booking process, the decedent was cooperative, but at times, he was passively uncooperative as evident by his refusal to sign paperwork and/or answer questions. Deputy two conducted a pat down search of decedent; he was found to have no contraband on his person.</p> <p>Deputy two completed the medical screening questionnaire and asked the decedent a series of medical history and condition questions. The medical screening questions were all checked "No" as a response to the questions, and the decedent refused to sign the form (<b>Exhibit A</b>).</p> <p><b>Note:</b> Custody Division Manual: 6-03/030.00, The Los Angeles County Unified Arrestee Medical Screening Form shall be initiated by arresting deputy/officer. This form is completed for every person who is arrested by Sheriff's Department personnel or booked into a Sheriff's Department station/facility by an outside law enforcement agency. The Behavioral Observation and Mental Health Referral form shall be completed for all inmates who answer in the affirmative to any of the following questions (<b>Exhibit A</b>):</p> <ul style="list-style-type: none"><li>○ Do you feel suicidal or feel like hurting yourself?</li><li>○ Did the arrestee threaten suicide or attempt during arrest?</li><li>○ Does the arrestee's behavior or statements suggest a risk of suicide?</li></ul> <p>After the booking process was completed, the decedent was placed in the Live Scan (electronic fingerprinting) waiting room.</p> <p>Prior to being Live Scanned, the decedent told the jailer he previously used methamphetamine. The jailer questioned the decedent further about his drug use, medical conditions, and if he was suicidal. The decedent replied he did not have any medical conditions, nor was he suicidal.</p> <p>While the jailer Live Scanned the decedent, he remained silent and was staring at her while he was being Live Scanned. The jailer asked the decedent if he was on any medication. The decedent responded by saying, "mmmmmh noooo." Based on his behavior, the jailer believed he may have been "coming off something."</p> <p>On November 30, 2018, at approximately 2:18 a.m., upon completion of being Live Scanned, the decedent was escorted to Cell E-1 (single-man cell) for housing. The decedent was provided food, a beverage, and a jail bed roll (1 sheet and 1 blanket).</p> <p><b>Over the next three hours, the following station jail visual checks were conducted:</b></p>
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Time of check	Length of time between checks
2:26 a.m. (Jailer)	8 minutes
3:04 a.m. (Jailer)	38 minutes
3:32 a.m. (Jailer)	28 minutes
4:00 a.m. (Watch Commander)	28 minutes
4:32 a.m. (Watch Sergeant)	32 minutes
5:18 a.m. (Jailer)	46 minutes
5:30 a.m. (Jailer)	12 minutes

**Note:** The Industry Station Jail was staffed with one full duty jailer (custody assistant). The second jailer assigned was light duty and completing paperwork in another part of the station. During the shift, there are thirty minute staggered safety checks by the jailer, two safety checks by the watch Commander, and two safety checks by the watch Sergeant on each shift.

At 5:18 a.m., a safety check was conducted and the jailer saw the decedent awake and alert and asked to use the telephone. The jailer told the decedent he would have to wait until shift change (in 45 minutes).

At 5:30 a.m., when the jailer conducted the next safety check, the decedent was seen laying on the cell floor with his head near the barred/screened gate and only his mid-back and feet were visible. A pool of blood was seen under the closed sliding barred gate.

The jailer notified the on-duty watch sergeant the decedent was apparently in need of medical attention inside his cell. The on-duty watch commander and assisting deputies responded to cell E-1.

Upon entry into cell E-1, the decedent was seen by responding deputy personnel lying face down with one end of a white bedsheet tied around his neck and the other around the base of the cell gate frame. Responding deputy three used shears from the station's Suicide Intervention Kit to cut the bedsheet from the decedent's neck. Once the bedsheet was removed from the decedent's neck, he was placed on his back (face up).

Deputy personnel monitored the decedent's vitals. Deputy three immediately began Cardiopulmonary Resuscitation (CPR) and deputy four used an Ambu bag (rescue breathing) on the decedent, pending arrival of the Los Angeles County Fire Department and paramedics.

The paramedics relieved the deputies and continued CPR on the decedent. During this incident, one of the paramedics contacted a doctor at Emanate Health Queen of the Valley Hospital (1115 South Sunset Avenue, West Covina, CA 91790) via telephone.

At 5:58 a.m., the decedent was pronounced deceased by the doctor over the phone.

At 6:00 a.m., the initial Homicide Detectives responded to Industry Sheriff's Station. At 7:30 a.m., the secondary Homicide Detectives arrived and were provided preliminary information regarding the incident and the decedent then proceeded to walk the scene.

During the investigation, the Los Angeles County Sheriff's Department's, Forensic Identification Specialist responded to Industry Sheriff's Station. The investigator documented and photographed the scene.

	<p>At 1:00 p.m., the decedent's mother arrived at Industry Sheriff's Station and was advised of the incident.</p> <p>At 1:11 p.m., the Los Angeles County Coroner arrived at Industry Station Jail and took custody of the decedent. The decedent was transported to the Los Angeles County Coroner's Office for further investigation.</p>
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1. Briefly describe the **root cause(s)** of the claim/lawsuit:

A **Department** root cause in this incident was deputies one and two's failure to identify the medical necessity to take a possibly impaired suspect for a medical evaluation after being told by his family members he had a drug problem.

A **Department** root cause in this incident was deputy two answering "No" to all of the medical questions on the Arrestee Medical Screening Form, even though the decedent refused to sign and was quiet throughout the process

**Department** root cause in this incident was the exposed bar on the cell door, which allowed the decedent to affix a noose made from a bed sheet.

A **Department** root cause in this incident was cell door scanners being inoperable due to poor Wi-Fi within the Industry Station jail.

A **Department** root cause in this incident was the deputies were not equipped with Body-Worn Cameras (BWC) to record their contact with the decedent and decedent's family member, in order to prove or disprove plaintiff's allegations.

A **Department** root cause in this incident was the lack of signage "Suicide Prevention Notice" within the direct vision of the decedent.

A non- **Department** root cause in this incident was the decedent refused to answer questions asked by the deputies and did not advise the jailer of his mental state of mind.

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

**Supervisory Inquiry**

This incident was thoroughly investigated by Industry Station to determine if deputy sheriff one and two's actions were within Department policy.

Appropriate administrative actions were taken.

**Station Briefings**

This incident was thoroughly investigated and the sergeant rebriefed the Sheriff's Department's policies regarding booking prisoners, emergency panel procedures, and radio communication.

**Cell Modifications and Inmate Bedding Modification**

Since this incident, Industry Station executives reviewed and discussed the physical condition of the station jail.

Facilities Services Bureau responded to Industry Station and welded a metal plate over the pole preventing it from being used in the same manner.

The issuance of bed sheets is no longer distributed to inmates at Industry Station. In place of the bed sheet, two blankets are given upon request from the prisoner.

**Internet Connect Wi-Fi Upgrade**

At the time of this incident, electronic scanners were not being used to conduct inmate safety checks. Times of cell checks were handwritten on a log to track required checks.

Since this incident, the Wi-Fi within the jail has been upgraded and allows the jailers to electronically document the cell checks via handheld scanners.

**Body-Worn Cameras (BWC)**

As of October 2020, all personnel assigned to Industry Station were issued Body-Worn Cameras in an effort to ensure all public contact is transparent. The use of BWC's ensures reliable recording of enforcement and investigative contacts with the public. The Department established policy and procedures for the purpose, use, and deployment of the Department issued BWC.

**Station Jail Posted Signage**

Signs are posted on the outside of the cell alerting inmates who are feeling suicidal to contact a deputy sheriff for help.

Additional signs were posted on the wall opposite of the cell. The signs are printed in both Spanish and English.



County of Los Angeles  
Summary Corrective Action Plan

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3. Are the corrective actions addressing Department-wide system issues?

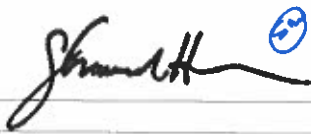
- ☐ Yes – The corrective actions address Department-wide system issues.
- ☒ No – The corrective actions are only applicable to the affected parties.

Los Angeles County Sheriff's Department

Name: (Risk Management Coordinator)

Shawnee N. Hinchman, A/Captain  
Risk Management Bureau

Signature:



Date:

6/13/22

Name: (Department Head)

Edwin E. Alvarez, Chief  
Professional Standards Division

Signature:



Date:

6/15/22

**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)

Destiny Castro

Signature:



Date:

06/15/2022

## **CASE SUMMARY**

### **INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION**

CASE NAME	Elisa Guardado, et al. v. County of Los Angeles, et al.
CASE NUMBER	20STCV33203
COURT	Los Angeles Superior Court
DATE FILED	August 31, 2020
COUNTY DEPARTMENT	Sheriff's Department
PROPOSED SETTLEMENT AMOUNT	\$ 8,000,000
ATTORNEY FOR PLAINTIFF	Adam Shea, Esq. Panish Shea & Boyle, LLP
COUNTY COUNSEL ATTORNEY	Jonathan McCaverty Principal Deputy County Counsel
NATURE OF CASE	<p>This is a recommendation to settle for \$8,000,000, inclusive of attorneys' fees and costs, a wrongful death and civil rights lawsuit filed by Decedent Andres Guardado's parents arising out of a fatal deputy-involved shooting in June 2020.</p> <p>Given the high risks and uncertainties of litigation, a reasonable settlement at this time will avoid further litigation costs. The full and final settlement amount of \$8,000,000 is recommended.</p>
PAID ATTORNEY FEES, TO DATE	\$ 460,630
PAID COSTS, TO DATE	\$ 94,349



## 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:	June 18, 2020, at approximately 5:53 p.m.
Briefly provide a description of the incident/event:	<p><u>Elisa Guardado, et al. v. County of Los Angeles, et al.</u> Summary Corrective Action Plan 2022-11</p> <p>On Thursday, June 18, 2020, two uniformed Los Angeles County Sheriff's Department deputy sheriffs assigned to Compton Station were on routine patrol (two-person unit) in a marked black and white patrol vehicle. They were patrolling the unincorporated area of Los Angeles County, known as East Gardena. While doing so, the deputies conducted a patrol check at the "Bow Down Performance," 420 West Redondo Beach Boulevard.</p> <p><b>Note:</b> The "Bow Down Performance" is an auto shop located in a commercial business district. There have been several violent incidents at the business: November 10, 2018, a male was shot and killed; June 9, 2020, a male was shot; and a male was arrested for the illegal possession of a firearm. Additionally, this business was known to both deputies as a location that illegally sold nitrous oxide to customers for human ingestion (no arrest noted for Possession of Nitrous Oxide, 381b of the California Penal Code).</p> <p>Deputies one (driver) and two (passenger) saw a vehicle (2003, silver, Ford Expedition) parked facing southbound in the driveway of Bow Down Performance (auto shop). The deputies observed a male (decedent), wearing a dark blue t-shirt and a black hat with a "D" logo on the front, standing near the front passenger side of the Ford Expedition. The deputies observed the Ford Expedition then drive westbound on Redondo Beach Boulevard. Deputies one and two identified probable cause for a traffic stop and a traffic stop was conducted in the south parking lot at 555 West Redondo Beach Boulevard in the city of Gardena.</p> <p>During the traffic stop, both deputies observed nitrous oxide type tanks and a bag of multicolored rubber balloons in the vehicle. When deputies inquired, the driver of the vehicle explained he had picked up the tanks from the "Bow Down Performance" auto shop and was delivering the tanks to another business. Based on the driver's statements, coupled with no arrestable offense, the deputies concluded the traffic stop and the driver was released without a citation.</p> <p>At approximately 5:52 p.m., the deputies were traveling eastbound Redondo Beach Boulevard. They observed a white Lexus occupied by two females parked on the south curb line in front of the driveway of the "Bow Down Performance" (420 West Redondo Boulevard, Gardena).</p>

	<p>Both deputies saw the same individual (decedent) they observed earlier (talking with occupants of the Ford Expedition) standing by the white Lexus.</p> <p>The individual (decedent) was bent at the waist, leaning towards the passenger side window conversing with the driver seated in the white Lexus.</p> <p>Shortly thereafter, the deputies pulled up and parked parallel to the driver-side of the white Lexus. Deputy two asked the decedent, "What are you doing?" The decedent looked up in the deputies' direction and appeared startled (wide eyes). He straightened his torso and walked backwards then ran south through the business driveway. Deputies one and two saw a handgun in the decedent's waistband area.</p> <p>The deputies swiftly exited their patrol vehicle and both deputies pursued after the decedent. Deputy one initiated emergency radio traffic advising they were in foot pursuit of an armed suspect. The deputies chased the decedent in a short, slow foot pursuit. The decedent stopped running, facing a westerly direction, with his hands concealed against his torso. Deputy one ordered the decedent to remove his hands from his torso. With his arms raised, the decedent displayed a firearm in his left hand. Deputy one updated his emergency radio traffic and stated he was detaining the decedent at gunpoint.</p> <p>Deputy one ordered the decedent to, "Drop the gun, and to get on the ground." The decedent initially surrendered and placed the pistol on the ground, approximately 2 to 3 feet away from his person, knelt down and laid down on his stomach. As deputy one approached the decedent to arrest him, the decedent repositioned himself within three inches in reach of the firearm on the ground. As the decedent attempted to reach for the semiautomatic pistol with his right hand, deputy one shot five times from his duty weapon. The decedent sustained five gunshots to his torso and all five of the gunshot wounds were fatal. Due to the pistol being in close proximity of the decedent's right hand, deputy one moved the firearm with his foot approximately six feet away.</p> <p>At the time of the deputy involved shooting, deputy two was positioned nearby within view of deputy one and only saw the lower half of the decedent's body. Deputy two did not fire his duty weapon.</p> <p><b>Note:</b> After the decedent ran and was chased by deputies, the driver (witness one) and passenger (witness two) of the white Lexus reversed, made a U-turn, and drove west on Redondo Beach Boulevard.</p> <p>The Los Angeles County Fire Department and paramedics were requested, and deputy two applied first aid to the decedent until Los Angeles County Fire arrived.</p> <p>Assisting units arrived on scene from Compton Station. Deputies three and four took the handle of the incident and established the command post.</p> <p>At approximately 5:56 p.m., the Los Angeles County Fire Department and paramedics arrived on scene. Although emergency medical care was administered to the decedent, he succumbed to his injuries and the Los</p>
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	<p>Angeles County Fire Department Captain pronounced the decedent deceased at 6:01 p.m.</p> <p>At approximately 7:40 p.m., the handling homicide investigators arrived at the command post, participated in a public safety briefing, and walk through of the scene with the handling deputies three and four.</p> <p>A thorough investigation was conducted and during the investigation, several witnesses and persons were interviewed; warrants were acquired and served for evidentiary purposes.</p> <p>During the investigation, it was learned the decedent was a security guard at the auto shop. However, he no longer employed with the security company "Precision Protective Service." Therefore, it was inconclusive if the decedent was employed as a security guard at the time of the incident.</p> <p><b>Note:</b> The decedent clothing did not identify him as a security guard, i.e. security uniform, security uniform jacket, or security uniform hat.</p> <p>On December 2, 2020, the homicide investigation was concluded and the case was submitted to the Justice System Integrity Division (JSID) of the Los Angeles County District Attorney's Office.</p>
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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 used of deadly force against the decedent who possessed a semiautomatic pistol.

A **Department** root cause in this incident was deputies one and two pursued the decedent in an alleyway, knowing he was armed with a firearm.

A **Department** root cause in this incident was the deputies should have developed a tactical plan of approach with back-up units and a supervisor, based on the prior knowledge of violent incidents at the location.

A **Department** root cause in this incident was the deputies did not have equipment (Body Worn Camera) to video record their contact with the decedent in order to prove or disprove plaintiff's allegations.

A **non-Department** root cause in this incident was the decedent's failure to comply/cooperate with Los Angeles County deputy sheriffs. Instead of staying at the location, the decedent ran away to avoid being contacted.

A **non-Department** root cause in this incident was the decedent's possession of a pistol, which he reached for which detained on the ground.

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

**Criminal Investigation**

This incident has been investigated by the Sheriff's Department Homicide Bureau to determine if any criminal misconduct occurred.

The investigation has been submitted to the Justice System Integrity Division (JSID) of the Los Angeles County District Attorney's Office for consideration of filing criminal charges. At the time of the report, the Los Angeles County District Attorney's Office had not advised the Department of their findings.

**Administrative Investigation**

Upon completion of the District Attorney's Office findings, the Sheriff's Department's Internal Affairs Bureau (IAB) will investigate this incident to determine if any administrative misconduct occurred before, during, or after the incident.

**Body Worn Cameras**

As of November 2020, all personnel assigned to Compton Station were issued a Body Worn Camera, as a form of transparency. Per policy, the camera must be turned on during all public contacts and reviewed by the employee, as well as a supervisor(s) regarding incidents and allegations of misconduct. Also, supervisors conduct random daily audits of Body Worn Cameras, to ensure compliance.

**Tactical De-brief**

Since the incident, to mitigate any future incidents, briefings were conducted on each shift with station personnel to address possible issues identified in the incident.

- Re-briefed the Los Angeles County Sheriff's Department Policy and Procedures- 5-09/220.50, Foot Pursuits.
- Re-briefed radio communication discipline and tactical approach best practices.

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)

Shawnee N. Hinchman, A/Captain  
Risk Management Bureau

Signature:



Date:

5/4/22

Name: (Department Head)

Edwin E. Alvarez, A/Chief  
Professional Standards Division

Signature:



Date:

5/9/22

**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)

Signature:

Date:

## **CASE SUMMARY**

### **INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION**

CASE NAME	Victor Avalos, et al. v. County of Los Angeles, et al.
CASE NUMBER	19STCV27032
COURT	Los Angeles Superior Court
DATE FILED	July 31, 2019
COUNTY DEPARTMENT	Children and Family Services
PROPOSED SETTLEMENT AMOUNT	\$ 32,000,000
ATTORNEY FOR PLAINTIFF	Brian Claypool Claypool Law Firm  Jay Deratany Deratany & Kosner
COUNTY COUNSEL ATTORNEY	Thomas Fagan Principal Deputy County Counsel
NATURE OF CASE	Plaintiffs allege that DCFS failed to properly investigate allegations that decedent and his half-siblings were being abused, and that a failure to take the children into protective custody contributed to their abuse and one child's death.  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 is in the amount of \$32,000,000 along with assignment of certain rights is recommended.
PAID ATTORNEY FEES, TO DATE	\$ 718,475
PAID COSTS, TO DATE	\$ 81,000





## 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:	February 13, 2020
Briefly provide a description of the incident/event:	Child Anthony A. and his family were the subjects of several reports to the Department of Children and Family Services (DCFS) Child Protection Hotline. While the family did not have contact with DCFS during the 18 months preceding Anthony's death, the family did have two prior cases with the Department. One was a Voluntary Family Maintenance (VFM) case with DCFS and the other, a Family Maintenance case supervised by the Juvenile Dependency Court.

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

### A. Improper application and/or use of VFM Services

The VFM services proffered to mother Heather Barron and children Anthony, Angel, Destiny, and Raphael were inappropriately terminated after six months, even though Ms. Barron was not in compliance with VFM case plan components and did not adequately address issues leading to DCFS intervention.

### B. Need for Enhanced Interviewing Skills

Children's Social Workers (CSWs) need more thorough training on interviewing, with particular emphasis on how to evaluate and further investigate when children provide inconsistent statements or retract previous statements of abuse or lack thereof.

### C. Incorrect use of Structured Decision-Making (SDM) Assessment Tools

While SDM tools were used with the referrals/cases concerning this family, there were inaccuracies in the tools' completion. Workers need to better understand the need for accurate completion of the tools, as inaccuracies can significantly impact the course of action necessary in any given case.

**D. Limited Capacities to Support Thorough Assessments**

There was a dearth of resources accessible to the CSWs during the handling of the referrals/cases, to help them navigate complex factors and issues concerning Anthony and his family.

**E. High Social Worker and Supervisor Caseloads**

The high rate of worker attrition and heavy caseloads ultimately affected the handling of referrals/cases, quality of supervision, and oversight of the family.

**F. Challenges with Accessing Medical Hub Services**

The High Desert Medical Hub that serves the Antelope Valley was unable to meet the needs of the DCFS-involved children in the region due in part to inconsistent approaches/protocols and their lack of ability to provide medical examinations.

**G. Lack of Collaboration with Law Enforcement**

DCFS and the Los Angeles Sheriff's Department (LASD) both regularly use the Electronic Suspected Child Abuse Report System to cross-report abuse allegations; however, there should have been better collaboration on the investigations and more coordinated efforts in the handling of referrals concerning this family.

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

**A. Improper application and/or use of VFM Services**

On August 3, 2020, the Department issued a revised policy (0080.502.02: Court Family Maintenance and Voluntary Family Maintenance) to underscore the purpose and function of voluntary services and add better oversight/accountability within its VFM practices.

**B. Need for Enhanced Interviewing Skills**

In June 2020, DCFS launched a training series covering different aspects of interviewing, including rapport-building; basic screening questions for assessing abuse; following up on an allegation; child recantations; and simple, non-leading approaches with children. These trainings are now mandatory for Emergency Response and Continuing Services Children's Social Workers and Supervising Children's Social Workers.

**C. Incorrect use of SDM Assessment Tools**

In 2019, DCFS launched a series of mandatory SDM trainings, including a two-day SDM "safety and risk" foundational training for field staff and managers focused on best practices in safety assessment, safety planning, and risk assessment.

**D. Limited Capacities to Support Thorough Assessments**

Since 2018, the County's Office of Child Protection (OCP) and DCFS have been working together with other County Departments to facilitate better access to resources, ultimately to help develop broader assessment capacities for DCFS. Some of those include increased access to Medical Hubs, outstation of Department of Mental Health (DMH) clinicians at DCFS regional/special program sites, outstation of substance abuse counselors versed in healing-informed care, and a DMH adult mental health services e-consultation pilot program.

**E. High Social Worker and Supervisor Caseloads**

Since 2019, DCFS has been working with Los Angeles County's Chief Executive Office and Department of Human Resources to substantially decrease the rate of attrition by recruiting and retaining highly qualified staff in the Antelope Valley (AV). The Strategies employed include community outreach and engagement for recruitment; providing enhanced training and supports to new and current staff; and providing bonuses as financial incentives for staff who choose to remain in, or relocate their work location to, the AV.

**F. Challenges with Accessing Medical Hub Services**

OCP has been working with the Department of Health Services since 2018, to target the primary barriers that made it a challenge for DCFS to secure adequate access/services from the High Desert Medical Hub: inadequacy of provider and

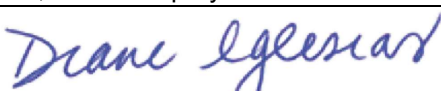
support staffing; limited hours of operation; availability of qualified forensic providers; inefficient scheduling processes; and accessibility of mental health clinicians.


**G. Lack of Collaboration with Law Enforcement**

Since 2018, DCFS and LASD have worked collaboratively to establish a joint investigation protocol, which launched at the Lancaster and Palmdale LASD stations in May of 2018, and the Santa Clarita LASD station in July of 2019. The protocol was memorialized in March of 2021, when DCFS and LASD established and entered into a Memorandum of Understanding.

3. Are the corrective actions addressing department-wide system issues?

- ☒ The corrective actions address department-wide system issues  
☐ The corrective actions are only applicable to the affected parties.

Name: (Risk Management Coordinator)	
Diane Iglesias, Senior Deputy Director	
Signature: 	Date: 7/19/22

Name: (Department Head)	
Brandon T. Nichols, Director	
Signature: 	Date: 7-19-22

**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)	
Destiny Castro	
Signature: <i>Destiny Castro</i>	Date: 07/20/2022

## LOS ANGELES COUNTY CLAIMS BOARD

### MINUTES OF REGULAR MEETING

AUGUST 15, 2022

**1. Call to Order.**

The meeting of the Los Angeles County Claims Board was called to order at 9:39 a.m. The meeting was held via teleconference with all Claims Board Members participating telephonically. Claims Board Members online for the teleconference meeting were: Chair Steve Robles, Arlene Barrera, and Adrienne M. Byers.

All other persons also appeared telephonically. Those attending the meeting were: Office of the County Counsel: Rosa Linda Cruz, David Lee, Timothy Kral, Pirjo Ranasinghe, Christopher Keosian, and Donna Koch; Department of Public Works: Russ Bryden; Public Defender's Office: Monnica Thelen, and Haydeh Takasugi; Sheriff's Department: Tania Plunkett, Jason Skeen, Jesus Carrasco, Shawnee Hinchman, Christopher Minott, Adam Kennedy, Matthew Webster, Alise Norman, Stacy Morgan, Frankie Lopez, Melynie Rivers, Shanese Winfrey, and Irma Chavez; Office of the Auditor-Controller: Oscar Valdez.

**2. Opportunity for members of the public to address the Claims Board on items of interest within the subject-matter jurisdiction of the Claims Board.**

No members of the public were on the public teleconference phone line to address the Claims Board.

**3. Closed Session – Conference with Legal Counsel – Existing Litigation (Subdivision [a] of Government Code section 54956.9).**

At 9:40 a.m., the Chair convened the meeting into closed session to discuss the items listed as 4(a) through 4(g).

**4. Report of actions taken in Closed Session.**

No members of the public were on the public teleconference phone line to hear the reportable actions of the Claims Board.

At 11:38 a.m., the Claims Board reconvened in open session via the public teleconference phone line and reported the actions taken in closed session as follows:

**a. Claim of Jeff Mohr and Linda Mohr**

Claimants seek compensation from the Los Angeles County Waterworks District No. 29 for property damage allegedly caused by a leaking storm drain pipe.

Action Taken:

The Claims Board approved settlement of this matter in the amount of \$94,000.

Vote: Ayes: 3 – Steve Robles, Arlene Barrera, and Adrienne M. Byers

b. **Nakia Rousie v. County of Los Angeles, et al.**  
**Los Angeles Superior Court Case No. 19STCV27609**

This lawsuit arises from alleged injuries plaintiff sustained while being transported in a Sheriff's Department transport van.

Action Taken:

The Claims Board approved settlement of this matter in the amount of \$65,000.

Vote: Ayes: 3 – Steve Robles, Arlene Barrera, and Adrienne M. Byers

c. **Dewey Orion Pepin v. Austin Wade Jordan, et al.**  
**Los Angeles Superior Court Case No. 20STCV06090**

This lawsuit arises from alleged injuries plaintiff sustained while being transported in a Sheriff's Department transport van.

Action Taken:

The Claims Board approved settlement of this matter in the amount of \$35,000.

Vote: Ayes: 3 – Steve Robles, Arlene Barrera, and Adrienne M. Byers

d. **Charles A. Daniels v. A. Villanueva, et al.**  
**United States District Court Case No. 2:20-cv-01169-RGK (SK)**

This federal civil rights lawsuit arises from alleged injuries plaintiff sustained in an altercation with Sheriff's Department deputies.

Action Taken:

The Claims Board approved settlement of this matter in the amount of \$47,000.

Vote: Ayes: 3 – Steve Robles, Arlene Barrera, and Adrienne M. Byers

e. **Walter Ringer v. County of Los Angeles**  
**Los Angeles Superior Court – Case No: 20STCV11278**

This lawsuit concerns allegations that a former employee of the Sheriff's Department was subjected to discrimination, harassment, and retaliation.

Action Taken:

The Claims Board approved settlement of this matter in the amount of \$55,000.

Vote: Ayes: 3 – Steve Robles, Arlene Barrera, and Adrienne M. Byers

**f. Claim of Jennifer Hunt**

This claim concerns allegations that a former employee of the Sheriff's Department was subjected to gender discrimination and retaliation.

Action Taken:

The Claims Board recommended to the Board of Supervisors settlement of this matter in the amount of \$300,000.

Vote: Ayes: 3 – Steve Robles, Arlene Barrera, and Adrienne M. Byers

**g. Bess Stiffelman v. County of Los Angeles  
Los Angeles Superior Court Case No. 20STCV33474**

This lawsuit concerns allegations that a former employee of the Public Defender's Office was subjected to retaliation.

Action Taken:

The Claims Board approved settlement of this matter in the amount of \$54,250.

Vote: Ayes: 3 – Steve Robles, Arlene Barrera, and Adrienne M. Byers

**5. Approval of the Minutes of the August 1, 2022, regular meeting of the Claims Board.**

Action Taken:

The Claims Board approved the Minutes.

Vote: Ayes: 3 – Steve Robles, Arlene Barrera, and Adrienne M. Byers

**6. Adjournment.**

The meeting was adjourned at 11:40 a.m.

LOS ANGELES COUNTY CLAIMS BOARD

By *Derek Stane*  
Derek Stane  
Claims Board Secretary