

# CLAIMS FOR DAMAGES TO PERSON OR PROPERTY

COUNTY OF LOS ANGELES



**INSTRUCTIONS:**

1. Read claim thoroughly.
2. Fill out claim as indicated; attach additional information if necessary.
3. Please use one claim form for each claimant.
4. Return this original signed claim and any attachments supporting your claim. This form must be signed.

DELIVER OR U.S. MAIL TO:  
EXECUTIVE OFFICER, BOARD OF SUPERVISORS, ATTENTION: CLAIMS  
500 WEST TEMPLE STREET, ROOM 383,  
KENNETH HAHN HALL OF ADMINISTRATION, LOS ANGELES, CA 90012  
(213) 974-1440

TIME STAMP  
OFFICE USE ONLY

BOARD OF SUPERVISORS  
COUNTY OF LOS ANGELES  
FILED

2020 JUN 23 A 8:22

<p>1. <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Ms. <input type="checkbox"/> Mrs. LAST NAME FIRST NAME M.I. Gonzalez Austreberto</p> <p>2. ADDRESS OF CLAIMANT 6210 Painter Avenue CITY STATE ZIP CODE Whittier CA 90601 HOME PHONE ALTERNATE PHONE (562) 298-2983</p> <p>3. CLAIMANT'S BIRTHDATE: 07/29/1978 4. CLAIMANT'S SOCIAL SECURITY NUMBER: [REDACTED]</p> <p>5. ADDRESS TO WHICH CORRESPONDENCE SHOULD BE SENT 80 S. Lake Avenue, Suite 880 STREET CITY STATE ZIP CODE Pasadena CA 91101</p> <p>6. DATE AND TIME OF INCIDENT 6/12/2020 4:31 pm</p> <p>7. WHERE DID DAMAGE OR INJURY OCCUR? 301 S. Willowbrook Avenue STREET CITY STATE ZIP CODE Compton CA 90220</p> <p>8. DESCRIBE IN DETAIL HOW DAMAGE OR INJURY OCCURRED AND LIST DAMAGES (attach copies of receipts or repair estimates): SEE ATTACHMENT</p> <p>9. WERE POLICE OR PARAMEDICS CALLED? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> (IF YES) AGENCY'S NAME _____ REPORT # _____</p> <p>CHECK IF LIMITED CIVIL CASE <input type="checkbox"/></p> <p>TOTAL DAMAGES TO DATE TOTAL ESTIMATED PROSPECTIVE DAMAGES \$ 10,000,000.00 \$ 10,000,000.00</p>	<p>10. WHY DO YOU CLAIM COUNTY IS RESPONSIBLE? SEE ATTACHMENT</p> <p>11. NAMES OF ANY COUNTY EMPLOYEES (AND THEIR DEPARTMENTS) INVOLVED IN INJURY OR DAMAGE (IF APPLICABLE):</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">NAME SEE ATTACHMENT</td> <td>DEPARTMENT</td> </tr> <tr> <td>NAME</td> <td>DEPARTMENT</td> </tr> </table> <p>12. WITNESS(ES) TO DAMAGES OR INJURY: LIST ALL PERSONS AND ADDRESSES OF PERSONS KNOWN TO HAVE INFORMATION:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">NAME SEE ATTACHMENT</td> <td>PHONE</td> </tr> <tr> <td colspan="2">ADDRESS</td> </tr> <tr> <td>NAME</td> <td>PHONE</td> </tr> <tr> <td colspan="2">ADDRESS</td> </tr> </table> <p>13. IF PHYSICIAN(S) WERE VISITED DUE TO INJURY, PROVIDE NAME, ADDRESS, PHONE NUMBER, AND DATE OF FIRST VISIT FOR EACH:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">DATE OF FIRST VISIT</td> <td style="width: 50%;">PHYSICIAN'S NAME</td> <td style="width: 30%;">PHONE</td> </tr> <tr> <td colspan="3">STREET CITY STATE ZIP CODE</td> </tr> <tr> <td colspan="3">NONE</td> </tr> <tr> <td>DATE OF FIRST VISIT</td> <td>PHYSICIAN'S NAME</td> <td>PHONE</td> </tr> <tr> <td colspan="3">STREET CITY STATE ZIP CODE</td> </tr> </table>	NAME SEE ATTACHMENT	DEPARTMENT	NAME	DEPARTMENT	NAME SEE ATTACHMENT	PHONE	ADDRESS		NAME	PHONE	ADDRESS		DATE OF FIRST VISIT	PHYSICIAN'S NAME	PHONE	STREET CITY STATE ZIP CODE			NONE			DATE OF FIRST VISIT	PHYSICIAN'S NAME	PHONE	STREET CITY STATE ZIP CODE		
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**THIS CLAIM MUST BE SIGNED**

*NOTE: PRESENTATION OF A FALSE CLAIM IS A FELONY (PENAL CODE SECTION 72)*

CLAIMS FOR DEATH, INJURY TO PERSON OR TO PERSONAL PROPERTY MUST BE FILED NOT LATER THAN 6 MONTHS AFTER THE OCCURRENCE. (GOVERNMENT CODE SECTION 911.2)

ALL OTHER CLAIMS FOR DAMAGES MUST BE FILED NOT LATER THAN ONE YEAR AFTER THE OCCURRENCE. (GOVERNMENT CODE SECTION 911.2)

14. PRINT OR TYPE NAME Alan Romero, Esq. (SBN 249000)	DATE 06/16/2020	15. SIGNATURE OF CLAIMANT OR PERSON FILING ON HIS/HER BEHALF, GIVING RELATIONSHIP TO CLAIMANT 	DATE 06/16/2020
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## GOVERNMENT CLAIM ATTACHMENT

### 8. Describe in detail how damage or injury occurred and list damages:

Claimant has been employed by the Los Angeles County Sheriff's Department ("LASD") as a Deputy Sheriff since November 2007, and has spent the past 5 ½ years as a patrol Deputy at Compton Station ("CPT").

Claimant is a decorated Marine Corps combat veteran who was also decorated with a Meritorious Conduct Silver Medal at the 2018 LASD Valor Awards for, along with his partner, saving the life of a 4 year old boy who had been shot in the head.

Claimant is also the parent of a medically fragile daughter, Caitlynne Gonzalez, born in 2005. Caitlynne is severely diabetic and requires regular shots of insulin and glucose testing approximately 10 times a day. Claimant has a court-ordered visitation schedule, and on those days he is responsible for caring for Caitlynne, he is her medical caregiver by injecting her with insulin and performing regular blood glucose level testing. Claimant is certified in diabetic education by the Children's Hospital of Orange County. If Caitlynne had to stay at home at Claimant's home without him present to medically attend to her, the child could possibly die due to neglect. Caring for Caitlynne was a full time job for the parent who was taking care of her. Caitlynne also suffers from Celiac disease which is a serious autoimmune disease resulting in the inability to ingest gluten without damage to the small intestine. This is a chronic condition for which there is no cure. As a result, Caitlynne's has severe dietary restrictions that must be complied with. Caitlynne's parents prepare most of her food at home to ensure the absence of gluten and the absence of cross-contamination during meal preparation. She is under the ongoing care of an endocrinologist to manage both her diabetes and Celiac.

CPT has been permeated by a violent Deputy gang which calls itself "The Executioners." The Executioners operate at CPT with impunity, its members using violence against other Deputies and members of the public in order to increase their standing within the criminal organization. The Executioners recruit members at CPT based upon the prospect's use of violence against suspects or other Deputies. Nearly all the CPT Deputies who have been involved in high-profile shootings and out-of-policy beatings at CPT in recent years have been "inked" members of The Executioners. "Inking" refers to the act of each newly made member of The Executioners receiving a matching tattoo indicating membership in the organization, the tattoo consisting of a skull with Nazi imagery, holding an AK-47, a gun most commonly utilized by gang members, and not any law enforcement agency. Members become inked as "Executioners" after *executing* members of the public, or otherwise committing acts of violence in furtherance of the gang. Deputies involved in fatal shootings at CPT have immediately been inked, with the organization having "inking parties" to celebrate Executioner member-involved shootings as well as the induction of new members. Of approximately 100 patrol Deputies at CPT, an estimated 20 are inked members of The Executioners, with another 20 being considered "prospects" or are otherwise close associates of the gang. The gang members communicate exclusively through WhatsApp, an encrypted messaging app on their phones, a technique used by criminals such as drug traffickers and terrorists. The Executioners do not allow African-American or female members.

The Executioners, led by inked “shotcaller” Deputy Jaime Juarez, have paralyzed CPT through their use of violence against Deputies, and threats of illegal “work slowdowns,” by which Executioners members, and associates at CPT, will purposefully cease some or all of their law enforcement duties, while continuing to be paid, in order to impose their will upon CPT by force. One such work slowdown occurred in 2019, when shotcaller Juarez, a Deputy, confronted Acting CPT Captain Larry Waldie. Juarez informed Waldie that he, and by extension The Executioners gang that he presided over, was demanding that the Training and Scheduling Deputy, Wanda Valiente, be replaced with an inked member of The Executioners. Deputy Anthony Bautista. The Training and Scheduling Deputy position was enormously desirable to the gang, as that position would be able to dole out preferred shifts to inked gang members, as well as provide them with any days off that they would desire... all to the extreme prejudice of non-gang members who would be disparately and negatively impacted by the most desirable schedules being funneled exclusively to the gang. Lt. Waldie immediately put his foot down and advised Juarez that he would not be intimidated into carrying out his duties based upon the desires of The Executioners. In retaliation, Juarez, The Executioners, and their associates at CPT implemented the threatened work slowdown, wreaking havoc at CPT and resulting in enormous losses to County taxpayers and these individuals who participated in the slowdown received their full public salaries for doing little or no work. Lt. Waldie, after notifying his superior, Captain Michael Thatcher instigated the punitive transfer of gang leader Juarez to Industry Station, but Lt. Waldie was later overruled, and Juarez was allowed to return to his gang home base at CPT.

In 2016, Claimant attempted to get scheduled to have certain days off so that he could provide medical care to his daughter, Caitlynne on those dates. At this time, Juarez was the Training and Scheduling Deputy, who operated the Station scheduling in a manner to benefit his gang. Claimant, a non-member of the gang, was refused these days off by Juarez. Claimant had no other option at this point but to go out on CFRA/FMLA leave, as his superiors with whom he discussed his situation with, refused to, or otherwise lacked the ability to confront Juarez, as he was the leader of the Station gang and rarely subject to meaningful supervision or control by his superiors due to his gang ties.

At this time, gang shotcaller Juarez, as the Training and Scheduling Deputy, changed Claimant’s schedule to the “early morning shift,” to accommodate an Executioners gang member, all of whom received preferential scheduling consideration over non-gang members or associates. Claimant was one of those non-gang members who experienced an adverse employment action as a result of his refusal to cooperate with the gang. Claimant protested this change, as the new work days would make it impossible for him to comply with this existing visitation order to provide medical care for Caitlynne on certain days of the month. Juarez refused to reconsider the schedule change, as Juarez was giving the preferred schedule to Deputy Jesus Sandoval, an inked Executioner. This change of schedule meant that Claimant would have different days off, and therefore could no longer provide care to his diabetic daughter on dates previously ordered by Court. Juarez taunted Claimant when being informed of Caitlynne’s medical needs: “it’s not going to happen... you either take the new shift and schedule I’m giving you or take your FMLA” It was then that Claimant informed Juarez that if forced to, he would take CFRA/FMLA leave in order to care for his severely ill daughter. Claimant protested to his supervisor, Sgt. Lopez, then the Scheduling and Training Sgt at CPT, but Lopez refused to consider the basis for Claimant’s objection and informed him that he would support Juarez’s erroneous decision.

Claimant then took 6-8 weeks off as PTO, constituting his CFRA/FMLA leave. Claimant would not have been forced to burn PTO if he had been allowed a reasonable accommodation in scheduling to care for his ill daughter on days that had been predetermined by court order. Claimant was denied this benefit of employment due to scheduling preference for Executioners gang members at CPT.

The Executioners also had a pattern and practice of showing preference to prospective members as soon as they were assigned to CPT. Once identified as prospects to become inked members, newly assigned CPT Deputies were allowed to partner up with inked members right away, when all other newly minted patrol Deputies were required to work by themselves for long periods of time. Further, prospects are allowed to skip assignment, or have their assignments shortened, to the non-preferred traffic or Compton Town Center mall substation detail. Claimant, as an example, was assigned to traffic duty for a period of 12-14 months, as he was not interested in becoming a gang prospect.

Juarez eventually returned to CPT from his IDT transfer. This is believed to be an act of gratitude shown by then Captain Thatcher to Juarez for assistance Juarez had previously directed his gang and gang associates to provide to Thatcher.

In August or September 2017, there was a meeting with various Captains at the Division level, and Thatcher was reprimanded for the arrest statistics being low at CPT. Thatcher reacted by implementing an illegal arrest quota framework at CPT, in violation of California law (see Veh. Code § 41602). Thatcher sought the assistance of Juarez and the gang, resulting in CPT arrest statistics increasing by an approximate 300% within a month. This was the result of gang members and their associates being directed by Juarez to begin arresting individuals for misdemeanor matters that would have previously not resulted in an arrest, or not resulted in a citation at all. Deputy Iliana Vargas, Juarez's girlfriend, was sometimes partnered up with Claimant during this period of time. During this period of time, Vargas would begin to make very unusual misdemeanor arrests, usually arresting an individual and then immediately releasing them in the field for no other purpose but to juke the arrest statistics as a favor from the gang to Thatcher.

Several weeks later, Lt. John Wargo held a briefing and informed all Deputies that their stats were low compared to other stations in the Division. Claimant was present when Wargo told all the Deputies present at the briefing that it was their job to arrest people, "so go do your job." After this meeting, Deputies with low arrest numbers were retaliated against and punished by having to work undesirable details such as working the front desk, traffic detail, or the Compton Town Center mall substation.

Days after the Wargo briefing where the Deputies were illegally ordered to meet arrest quotas or face punishment, Claimant along with Deputies Jonathan Alcala and Gabriel Guzman complained about the illegality of the quota order to the Acting Watch Commander, Sgt. Andy Leos, as the unlawful idea to punish Deputies with low arrest stats originated from Juarez and Leos. When confronted by the Deputies and asked if undesirable assignments were being improperly used as punishment for not meeting illegal arrest quotas, Leos admitted, "yes, you should have known that by now." Leos further stated that if someone had a problem with the new quota program, that they were welcome to come to his office so that Leos could show them their "low stats." Leos raised

his voice to Claimant and Deputies Alcala and Guzman and told them to “do your job, I’m trying to save your career.” Alcala protested and said he was doing his job, to service calls for assistance from the public. As a result of this interaction, Claimant, Alcala, and Guzman were all reprimanded as punishment for protesting the illegal quota program and were demoted and immediately put on a rotation to traffic duty. Alcala had been slated to promote to the Special Assignments Office (“SAO”) at CPT, but after he protested to Leos, Leos informed the Sergeant commanding SAO to refuse the transfer to Alcala.

Due to this illegal arrest quota regime, average arrests per Deputy immediately went from approximately 2.5 arrests per month to approximately 7 arrests per month. This resulted in the violation of the civil rights of hundreds of residents of the CPT patrol area for no other reason but to insulate Thatcher from criticism from his Division. Finally, Thatcher called a meeting with the patrol Deputies and told them he was pleased with the results and new, artificially inflated arrest figures.

On October 25, 2019, Claimant was recognized for his long and diligent service by being promoted to a Field Training Officer (“FTO”). Claimant received 5% FTO pay increase. Claimant’s first trainee was Deputy David Battles. Master FTO Saul Romero commended Claimant for doing a good job of timely turning in his training Daily Observation Reports. On February 13, 2020, the month after Claimant completed his training of Battles, MFTO Romero told Claimant to report to the LASD Patrol School so that Claimant could have the first opportunity to pick his next trainee. Battles was an ideal patrol candidate and had excelled in, and completed, all but his final training phase. At this time, he was failed out of training by inked Executioners member Deputy Edwin Barajas. Claimant believes that Battles was retaliated against because of his association with Claimant.

Thereafter, Gang member Deputy Eugene Contreras had returned to CPT after a temporary assignment to the Internal Affairs Bureau (“IAB”). Upon his return, he began extremely aggressive, bullying behavior towards other Deputies with the intent of raising his standing within the gang. Contreras is presently on the list to promote to Sergeant at CPT.

In February 2020, Contreras, now a FTO, threatened fellow FTO Deputy Thomas Banuelos with violence. This led to an altercation in which Contreras assaulted Banuelos on-duty. This assault was intended to further the reputation of the gang at CPT.

On February 8, 2020, Banuelos texted Claimant, who was another fellow FTO, and informed him of Contreras’ violent conduct. Claimant was familiar with the aggressive behavior of Contreras, who Claimant knew to be inked. A few days later, Claimant fulfilled his obligation to report this violent incident anonymously to IAB. As Claimant would later learn, there was nothing confidential about this report, as the Executioners gang had infiltrated IAB and would later obtain a recording of his voice making the “anonymous” phone call to IAB. Within two days of the anonymous call, inked members of The Executioners already knew it was Claimant who made the call. While at a Patrol School training, Claimant was mortified when Deputy Alcala informed him that “[The Executioners] are saying that it was you who called IA, and they can’t wait to get their hands on the voice print of the call.” Claimant immediately realized that as Contreras had previously worked at IAB, that a former co-worker at IAB had illegally warned Contreras of the

complaint. This put Claimant at severe risk of violent reprisal by the gang, so Claimant took several days off from work.

After returning to work, Claimant was still struggling to process all of this information. Claimant confided in his Operations Lieutenant, Lt. Ruiz, that he was the one who had called IAB regarding Contreras, and that Claimant wanted to remain anonymous to the extent possible. Claimant found himself in a worst-case scenario, as the entire CPT Station knew it was him who had reported an inked member of The Executioners to IAB. Claimant knew that reprisal by the gang was inevitable as a result of the leak of his identity to The Executioners. Claimant requested a week off of work due to his well-founded fear of violent attack by the gang. During this week off, Deputy Alcala text messaged Claimant a photo of graffiti in a very visible place in the Station which read: "ART IS A RAT". This confirmed that IAB had been penetrated and compromised by the criminal organization, and that his identity had been leaked despite LASD Department policies which purported to protect the identity of anonymous whistleblowers. This has the practical effect of calling the integrity of the entire IAB and anonymous reporting program into question.

Complainant went back to Lt. Ruiz, as he was afraid he would be violently assaulted by the gang, as they had assaulted Banuelos. Complainant took a week off, he spoke with CPT Captain LaTonya Clark and again memorialized his fear of violent reprisal by the gang. Clark told Claimant that two investigators wanted to talk to him regarding his anonymous IAB complaint. Claimant agreed, as his protected identity had already been compromised. Clark told Claimant that the investigators were not from IAB, but rather part of a special detail from the Office of the Executive.

The next day, the two investigators arrived at the Station, unannounced, and informed the front desk that they were there to speak with Claimant. Again, this was a worst-case scenario, as their presence became known to the entire station, and especially inked gang member Deputy Bautista, who was serving as the Watch Deputy that day, and informed Claimant's partner, Deputy Adrian Garcia, that "two IA investigators are here to talk to Gonzalez, so get over here."

At this first meeting, Gonzalez told the investigators everything he knew about the Contreras assault. He did, however, reiterate the fact that he wanted to remain anonymous, and that he didn't want his name associated with the anonymous call due to the threat of violent retaliation from inked Deputies at this station. The investigators told Claimant that they may want to meet him again, but Claimant protested and told the investigators that any future meetings would have to be done away from CPT Station, out of fear of retaliation. Claimant became aware that Lt. Ruiz had forwarded the photo of the threatening graffiti identifying Claimant to the investigators.

In late February 2020, after returning from his week off from work, Claimant was approached by Scheduling Sergeant Frank Barragan, and was taken upstairs to the Conference Room. Barragan reprimanded Claimant for taking intermittent CFRA/FMLA 3-5 days per month to care for his ill daughter, Caitlynne. Barragan informed Claimant that he was being demoted from his FTO position. Claimant protested, asserting his rights under the law. Barragan replied to Claimant that, "it would be a disservice to your trainee if you are taking FMLA days off." This was inaccurate because when Claimant was training Battles, Claimant didn't take a single day off for medical leave. Claimant had taken several unscheduled days off during this period of time to care for

Caitlynne, and these days had been approved. This had not resulted in any meaningful disruption in his training of Battles, nor would such leave interfere with the training of any future Deputy under Claimant's supervision. Further, it was common practice for other FTOs at CPT to miss 1-2 days of work a week, or even taken an entire week off while a trainee has been assigned to them. It was clear that the only reason for this demotion was as retaliation for his having taking protected medical leave, but more importantly, because of his protected whistleblower activities against the Station gang-in-residence. Claimant, suffered a 5% reduction in pay as a result of this retaliatory demotion meaning that he will not have any trainees assigned to him.

At this meeting where Sgt. Barragan reprimanded Claimant for taking protected leave, Claimant was given an ultimatum. Barragan informed Claimant that, "there are two ways to do this, you can voluntarily not take trainees and the other way is we start documenting." Claimant understood this to be a threat by which if Claimant did not acquiesce to the demotion from his FTO position, that Sgt. Barragan and others would begin the process of "documenting" Claimant for discipline and inevitable demotion and/or termination. Resultantly, Claimant signed a memo that Sgt. Barragan had prepared prior to the meeting which stated that Claimant voluntarily was relinquishing his FTO position due to his need to take protected leave to care for his daughter. Claimant had no choice in signing this document, as he had been effectively ordered by his direct superior to sign the document or lose his job. On or about this time, Sgt. Barragan authorized the hiring of "temporary" FTOs and the "temporary" FTO position was offered to Juarez and other members, or prospects, of The Executioners. Claimant believes that Juarez exercised the power of the gang to control who would be eligible for an FTO position, and to retaliate against Claimant as a result of his IAB complaint against the gang.

As of now, no other Deputy at CPT will partner with Claimant due to his being targeted for retaliation by The Executioners. Further, the inked Deputy in dispatch, Bautista, began a pattern and practice of slamming Claimant with excessive calls compared to other Deputies on the same shift. Claimant complained to his supervisor, Lt. Ruiz about the excessive calls for service. Lt. Ruiz's response was "I can forward this as a POE (policy of equality) violation to "the Intake" (the intake of complaints handled by IAB). Claimant did not see this as a viable option given that IAB had already leaked the voice print from his whistleblower call and he requested Lt. Ruiz not make that referral. Lt. Ruiz expressed frustration and asked Claimant to leave his office, despite the fact that Lt. Ruiz had previously assured Claimant that if he ever felt retaliated against, to please come and ask Lt. Ruiz for assistance.

Claimant met with the investigators a second time, this time at the Long Beach Police Department. Claimant asked the investigators if he put his name on the complaint, how long would it take for Contreras to learn his identity. The investigators assured Claimant that it would be months until Contreras would learn his identity. Previous to this meeting, Claimant had asked Captain Clark if he could be transferred to another Station. Captain Clark offered Claimant an immediate or "overnight" transfer to East LA Station, but Claimant declined due to the fact that this would cement his identity as the whistleblower to the gang. Claimant instead requested a standard transfer to Pico Rivera Station (a separate Division), the opportunity for which was coming up in several months. In the end, Claimant was denied this transfer.

On March 26, 2020, Claimant was assigned to a “Memorial Detail”, by which Deputies stand guard for one-hour shifts at a location where a police officer has been slain. Claimant was assigned to stand guard until 3:00PM, which was the time that his shift was due to end. Resultantly, Claimant did not finish his shift until one hour after his scheduled end time: at 4:00PM. Claimant went to his Operations Lieutenant, Lt. Ruiz and Lt. Nicole Palomino, the Watch Commander. Both Lieutenants denied Claimant’s legitimate request for overtime, claiming that such overtime was required to be preauthorized. This was not common practice, as CPT Deputies are regularly paid overtime in situations where they are legitimately held over past the end of their shift.

During Mid-March to Early April 2020, the Scheduling Sergeant, Sgt. Barragan called Claimant and informed him that Contreras would be coming to the same day shift as Claimant. This obviously belied the fact that Claimant’s identity as the whistleblower was known to Barragan, Contreras, and others at CPT. Barragan requested that Claimant switch to the “early morning” graveyard shift, and that Claimant would be given whatever days he wanted off. Claimant refused, informing Barragan that it would not allow him to care for his medically fragile daughter, Caitlyne. Barragan queried Claimant: “do you have a problem with [Contreras] working the same shift as you?” Claimant realized that he would not be allowed to mind his own business, and that he would not be able to avoid interactions with Executioners gang members while a Deputy at CPT.

Two weeks later, Lt. Ruiz informed Claimant that he could be removed from Patrol and go on loan to the CPT Detective Bureau (“DB”), and be tasked with filing cases on behalf of the Station at the Compton Courthouse. Claimant was not requesting to be reassigned but it became clear that Contreras was coming to day shift no matter what and there was no way to stop that. This is another way in which the Executioners are accommodated. Realizing that Claimant’s only options were to be involuntarily transferred to DB or to be punitively placed on the early morning shift that would not allow him to care for his daughter, he accepted the reassignment to DB so he could preserve his schedule of work hours and days off. Importantly, Sgt. Barragan never offered the option of PM shift, as PMs is heavily staffed by inked deputies. Claimant also saw this as an opportunity to distance himself from The Executioners at CPT and so he accepted the assignment. However, The Executioners’ presence was felt in the new assignment as Deputy Bautista was also on loan to DB. The pencil holder, mouse, and mouse pad at Deputy Bautista’s desk displayed the Executioners tattoo logo. Deputy Bautista’s computer screen saver was a taunting picture/message. The picture showed a black and white police vehicle with the Sheriff’s Dept. logo on it, surrounded by with what appears to be detained gang members posing for a picture. The caption on the picture was “Some people worked Compton, others just claimed they did!!!” This message was purposefully displayed in an area that Claimant dropped off case tracking sheets for the detectives at each of their desks each day and Claimant believes it was intended as a warning/reminder to everyone of the Executioners’ presence and span of control.

Most recently, on a phone call with Claimant, Deputy Alcala informed Claimant that a few months before, Deputy Sergio Jimenez had informed Alcala that he had been approached by a member of the Special Enforcement Bureau (“SEB”) at CPT who claimed that he had a copy of the recording of Claimant’s call to IAB. The SEB Deputy told Jimenez, “[Claimant] is saying all kinds of things and name-dropping, do you want to hear it?” Deputy Alcala told Claimant that Jimenez had told



the SEB Deputy that he was not interested in hearing the recording, and told Alcala that he didn't want to be involved in these events.

**10. Why do you claim County is responsible?**

The aforementioned unlawful acts were undertaken by LASD employees in derogation of the rights of Claimant.

Claimant has been subject to harassment, discrimination, retaliation, and disparate treatment as a result of his protected status(es).

These acts constitute violations of the California Fair Employment and Housing Act and the California Labor Code, including, but not limited to, Labor Code §§ 98.6 & 1102.5. Further, these acts violate the LASD Manual of Policies and Procedures. Claimant has been damaged in an amount to be determined at time of trial. Claimant has experienced economic and non-economic damages in an amount set forth in this claim form. Claimant's damages are ongoing and include, but are not limited to, the salary differential between his present position and the position that he would have been promoted to were it not for the illegal interference of LASD in violation of the County Charter and Civil Service Rule 25.

**11. Names of any County employees (and their Departments) involved in injury or damage:**

Deputy Jaime Juarez  
301 S. Willowbrook Avenue  
Compton, CA 90220  
(310) 605-6500

Lt. Steven Ruiz  
TRAP (Task Force for Regional Auto Theft Prevention)

Lt. John Wargo  
301 S. Willowbrook Avenue  
Compton, CA 90220  
(310) 605-6500

Sgt. Andy Leos  
301 S. Willowbrook Avenue  
Compton, CA 90220  
(310) 605-6500

Deputy Edwin Barajas  
301 S. Willowbrook Avenue  
Compton, CA 90220  
(310) 605-6500

Lt. Nicole Palomino  
301 S. Willowbrook Avenue  
Compton, CA 90220  
(310) 605-6500

**12. Witnesses to damages or injury: List all persons and addresses of person known to have information:**

Lt. Larry Waldie  
[Unknown]

Deputy Wanda Valiente  
301 S. Willowbrook Avenue  
Compton, CA 90220  
(310) 605-6500

Deputy Anthony Bautista  
301 S. Willowbrook Avenue  
Compton, CA 90220  
(310) 605-6500

Deputy Iliana Vargas  
301 S. Willowbrook Avenue  
Compton, CA 90220  
(310) 605-6500

Deputy Jonathan Alcala  
301 S. Willowbrook Avenue  
Compton, CA 90220  
(310) 605-6500

Deputy Gabriel Guzman  
301 S. Willowbrook Avenue  
Compton, CA 90220  
(310) 605-6500

Deputy David Battles  
11705 Alameda Street  
Los Angeles, CA 90059  
(213) 473-6100

Deputy Eugene Contreras  
301 S. Willowbrook Avenue  
Compton, CA 90220  
(310) 605-6500

Deputy Thomas Banuelos  
301 S. Willowbrook Avenue  
Compton, CA 90220  
(310) 605-6500

Deputy Adrian Garcia  
150 Hudson Avenue  
City of Industry, CA 91744  
(626) 330-3322

Deputy Sergio Jimenez  
301 S. Willowbrook Avenue  
Compton, CA 90220  
(310) 605-6500