



January 17, 2023

VIA HAND DELIVERY & CERTIFIED U.S. MAIL

Executive Officer, Los Angeles County Board of Supervisors
Attention: Claims
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 383
Los Angeles, CA 90012
T: (213) 974-1411
F: (213) 620-0636

To the County of Los Angeles:

This is a notice of government tort claims pursuant to California Government Code § 910 *et seq.*, arising out of actions by the Los Angeles Sheriff's Department ("LASD").

Name of Claimant:

Darral Scott, professionally known as Feezy Lebron, on behalf of himself and all others similarly situated, c/o Brian Olney and Morgan Ricketts, Hadsell Stormer Renick & Dai LLP, 128 N. Fair Oaks Ave., Pasadena CA 91103.

Address to which notices should be sent:

Claimant's Attorneys Hadsell Stormer Renick & Dai, LLP, 128 N. Fair Oaks Ave. #204, Pasadena CA 91103.

How damages or injuries occurred:

While Claimant was sitting in his BMW sedan in a private parking lot listening to music as he waited for a friend on New Year's Eve, 2022, members of the LASD pulled into the parking lot, got out of their patrol vehicle and began to harass Claimant without any reasonable suspicion or probable cause. One deputy opened Claimant's car door without warning, grabbed his arm and attempted to pull him out of the car. When Claimant asked for an explanation, the second deputy, believed to be Justin Sabatine, became angry and pulled out his pepper spray, directing his fellow deputy to move away, because he was "just going to spray him." Without any justification, the deputy then drew his firearm and pointed it directly at Claimant at point blank range, who had his hands up and was not moving. The second deputy threatened Claimant that he would "shoot you" and that Claimant would get "one right to the chest." Claimant was then forced out of his car, searched, and tightly handcuffed, causing him physical injuries which manifested in visible bruising the next day, and he was detained in the back of a patrol vehicle for approximately 20-40 minutes while deputies searched his car without consent or lawful justification. Ultimately Claimant was released with only a ticket for a missing front license plate.

Shortly following his release, Claimant drove to the Los Angeles Sheriff's Department station and attempted to file a complaint with LASD regarding his treatment. Approximately 4-5 additional deputies or more retaliated against him, including by lying to him about their purported inability to take his complaint, requiring him to wait approximately 4 hours to file his complaint, and by allowing and directing the deputy who had threatened Claimant with a gun to attempt to bully Claimant into not filing a complaint.

The incident violated Claimant's rights under state and federal law, including multiple unlawful uses of force, the unlawful detention and search of his person and vehicle, and delay as he was forced to wait for deputies to conclude their campaign of unlawful and unwarranted harassment, and further delay and retaliation against Claimant for attempting to exercise his First Amendment rights to express his opinion and to complain to his government for redress of grievances. The incident has caused and continues to cause Claimant significant physical injury and emotional distress.

Deputy Sabatine was involved in a prior officer involved shooting and online reports claim he is involved with a Deputy Gang called the "Grim Reapers."

When damages or injuries occurred:

Between approximately 5:30 p.m. on December 31, 2022, and 2:00 a.m. on January 1, 2023.

Where damages or injuries occurred:

In the County of Los Angeles, in a commercial parking lot at around 14908 Crenshaw Boulevard in Gardena.

Act or omission causing injuries:

LASD deputies approached Claimant without reasonable suspicion to detain him, opened his car door, touched him without consent or lawful justification, and pointed pepper spray and a gun at Claimant without a lawful basis to do so. Other deputies on scene failed to intervene and stop the primary offending deputy from threatening Claimant's life and risking his safety. Deputies then handcuffed Claimant and searched his person and his car, all without reasonable suspicion or probable cause.

Names of persons causing injuries:

Employees and members of the Los Angeles Sheriff's Department present at the scene of the incident in the parking lot and/or at the Sheriff's Station where Claimant attempted to file a complaint, including but not limited to the following persons: Deputy Justin Sabatine, badge number 623021; Deputy Jacob Ruiz, badge number 663350; and Officer Dominguez, badge number 3492. The identity of the other involved Deputies are currently unknown to Claimant and will be revealed during discovery. Policymakers and supervisors including but not limited to Sheriff Robert Luna for negligent hiring, supervision, and retention.

Damages or injuries:

Claimant suffered pain and bruising from the tight handcuffs, humiliation and embarrassment, fear, anguish, anxiety, and terror at having his life threatened, and other forms of past and continuing emotional distress. Claimant also was unlawfully detained for between 20-40 minutes as deputies searched his car, and later was delayed in filing his complaint by at least 3-4 hours due to LASD deputies' conduct. Claimant thought he would be killed and would never see his children again. Claimant has been completely traumatized by the incident and sought emergency care several days later. He continues to suffer panic attacks, is unable to sleep, and is afraid to drive.

Hadsell Stormer Renick & Dai LLP

January 17, 2023

Page 3

Amount claimed at this time:

Within the jurisdiction of the Superior Court, but greater than the jurisdiction of the Superior Court, limited jurisdiction.

Deficiency in claim:

If this claim fails to comply in any respect with Government Code § 910 or § 910.2, you are required to provide written notice of the deficiency pursuant to Government Code § 910.8.

Very truly yours,

A handwritten signature in black ink that reads "Morgan Ricketts". The signature is written in a cursive, flowing style.

Morgan Ricketts, Partner
Hadsell Stormer Renick & Dai, LLP