

Luis A. Carrillo, Esq., SBN 70398
Michael S. Carrillo, Esq., SBN 258878
CARRILLO LAW FIRM, LLP
1499 Huntington Drive, Suite 402
South Pasadena, CA 91030
Tel: (626) 799-9375
Fax: (626) 799-9380

Assigned for all purposes to
Judge Jeffrey B. Jones
including trial

Attorneys for Plaintiffs
MANUEL OROZCO, SERGIO RUELAS, LUIS
AMARILLAS, JESUS RUELAS and ANDRES OROZCO

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE IMPERIAL COUNTY

MANUEL OROZCO, SERGIO RUELAS, LUIS) Case No.: ECU002166
AMARILLAS, JESUS RUELAS and ANDRES)
OROZCO,) COMPLAINT FOR DAMAGES
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)
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Plaintiffs,)
) **DEMAND FOR JURY TRIAL**
vs.)
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IMPERIAL COUNTY, and DOES 1-20, inclusive)
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Defendants.)
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COME NOW Plaintiffs MANUEL OROZCO, SERGIO RUELAS, LUIS AMARILLAS, JESUS RUELAS and ANDRES OROZCO (collectively, "Plaintiffs"), demanding a trial by jury, and for her causes of action alleges as follows:

I.

GENERAL ALLEGATIONS

1. Plaintiff MANUEL OROZCO, is an individual and at all relevant times was involved in a collision that occurred in the County of Imperial, State of California
2. Plaintiff SERGIO RUELAS, is an individual and at all relevant times was involved in a collision that occurred in the County of Imperial, State of California.

1 3. Plaintiff LUIS AMARILLAS, is an individual and at all relevant times was involved in a
2 collision that occurred in the County of Imperial, State of California.

3 4. Plaintiff JESUS RUELAS, is an individual and at all relevant times was involved in a
4 collision that occurred in the County of Imperial, State of California.

5 5. Plaintiff ANDRES OROZCO, is an individual and at all relevant times was involved in a
6 collision that occurred in the County of Imperial, State of California.

7 6. Defendant IMPERIAL COUNTY, hereafter “COUNTY” or “IMPERIAL COUNTY” is a
8 municipal corporation under the laws of the State of California, with the capacity to sue and be sued.
9 Defendant COUNTY is responsible for the actions, omissions, policies, procedures, and negligent acts,
10 practices, and customs of its employees, such as Deputy Anthony Redondo and Does 1-20. The Imperial
11 County Sheriff’s Department (“IMPERIAL COUNTY SHERIFF’S DEPARTMENT”) is a Department
12 within COUNTY. IMPERIAL COUNTY SHERIFF’S DEPARTMENT Deputy Anthony Redondo was the
13 Sheriff’s deputy that was responsible for causing the injuries to Plaintiffs herein.

14 7. Defendant COUNTY is a public entity, upon which Plaintiffs have, pursuant to Government
15 Code §§ 905 & 910 et seq., timely served with written government tort claims. Pursuant to Government
16 Code§ 945.4, such government claims have been deemed to have been rejected by Defendant COUNTY.

17 8. Deputy Anthony Redondo was an employee of the IMPERIAL COUNTY SHERIFF’S
18 DEPARTMENT who was acting in the course and scope of his employment at the time of the incident
19 herein.

20 9. On June 26, 2021, IMPERIAL COUNTY Sheriff’s Deputy Anthony Redondo was travelling
21 at or near the intersection of West Aten Road and Forrester Roads in the unincorporated area of Imperial
22 County in his marked deputy vehicle in the evening just after 7:00 p.m. For reasons unknown, Deputy
23 Redondo was driving his marked vehicle at a high rate of speed and failed to activate his lights and sirens in
24 response to a call for service. While traveling at a high rate of speed, Deputy Redondo failed to yield at a
25 stop sign at the intersection and struck a 2021 Chevy Silverado that was being driven by Manuel Orozco and
26 whose passengers included Plaintiffs and Trent Cox. All Plaintiffs in the truck suffered severe physical and
27 mental injuries.

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1 10. Plaintiffs are informed, believe, and therefore allege as follows: IMPERIAL COUNTY
2 Sheriff's Deputy Anthony Redondo was negligent in the operation of his vehicle when he was travelling at
3 an excessive speed and blew through the stop sign. Further, IMPERIAL COUNTY Sheriff Deputy Anthony
4 Redondo failure to activate his lights and sirens was negligent. The collision of Deputy Redondo's patrol
5 vehicle was an actual, legal and proximate cause of, and a substantial factor in causing, the serious injuries
6 suffered by Plaintiffs.

7 11. Defendant IMPERIAL COUNTY failed to properly train Deputy Anthony Redondo that
8 caused the crash. Defendant IMPERIAL COUNTY negligently trains Sheriff's Deputies in proper driving
9 tactics when dealing with members of the public and residents of IMPERIAL COUNTY. The training
10 programs of IMPERIAL COUNTY are inadequate in relation to the tasks that Sheriff's deputies must
11 perform. Defendant IMPERIAL COUNTY and Sheriff's Department Supervisors negligently supervise
12 Sheriff's Department Deputies, such as Deputy Anthony Redondo.

13 12. At the time of the collision, Deputy Anthony Redondo was driving an IMPERIAL COUNTY
14 SHERIFF'S DEPARTMENT patrol vehicle in excess of the legal speed limit. Moreover, Plaintiffs are
15 informed and believes that Deputy Anthony Redondo was driving the IMPERIAL COUNTY SHERIFF'S
16 DEPARTMENT patrol vehicle without emergency lights flashing or siren sounding at the time of the
17 collision.

18 13. The true names and capacities, whether individual, plural, corporate, partnership, associate,
19 or otherwise, of DOES 1 through 20, inclusive, are unknown to Plaintiffs who therefore sues said
20 Defendants by such fictitious names. The full extent of the facts linking such fictitiously sued Defendants is
21 unknown to Plaintiffs. Plaintiffs is informed and believes, and thereon alleges, that each of the Defendants
22 designated herein as a DOE was, and is, negligent, or in some other actionable manner, responsible for the
23 events and happenings hereinafter referred to, and thereby negligently, or in some other actionable manner,
24 legally and proximately caused the hereinafter described injuries and damages to Plaintiffs. Plaintiffs will
25 hereafter seek leave of the Court to amend this Complaint to show the DOE Defendants' true names and
26 capacities after the same have been ascertained.

27 14. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned herein,
28 Defendants, IMPERIAL COUNTY, and DOES 1 through 20, inclusive, were agents, servants, employees,

1 and/or joint venturers of co-Defendant COUNTY, and were, as such acting within the course, scope, and
2 authority of said agency, employment, and/or venture, and that each and every Defendant, as aforesaid,
3 when acting as a principal, was negligent in the selection, hiring, and supervision of each and every other
4 co-defendant as an agent, servant, employee, successor in interest, and/or joint venturer.

5 15. Plaintiffs are informed and believe, and thereon allege, that pursuant to California
6 Government Code §§ 815.2, 815.4, and 820(a), Defendant COUNTY is vicariously liable for the actions and
7 omissions of its employees, agents, or independent contractors, including but not limited to, Deputy
8 Anthony Redondo and DOES 1 through 20, inclusive, for any negligent acts or omissions that caused
9 Plaintiffs injuries and death.

10 16. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned herein,
11 Deputy Anthony Redondo and DOES 1 through 20, inclusive, were acting in the course and scope of their
12 employment with Defendant COUNTY.

13 **II.**

14 **FIRST CAUSE OF ACTION**

15 **Negligence**

16 **By Plaintiffs Against All Defendants**

17 17. Plaintiffs re-allege and incorporate herein by reference each and every allegation and
18 statement contained in the prior paragraphs. Plaintiffs are informed and believe, and thereon allege, that at
19 all times mentioned herein, Defendant COUNTY and DOES 1 through 20, inclusive, had an ownership
20 interest in, or otherwise had control over the IMPERIAL COUNTY SHERIFF’S DEPARTMENT patrol
21 vehicle involved in causing Plaintiffs severe injuries. On June 26, 2021, the IMPERIAL COUNTY
22 SHERIFF’S DEPARTMENT patrol vehicle that was being operated by Deputy Anthony Redondo, was with
23 the consent, knowledge, and permission of Defendant COUNTY and DOES 1 through 20, inclusive.

24 18. On June 26, 2021, Deputy Anthony Redondo had a duty to operate, drive, control, the
25 IMPERIAL COUNTY SHERIFF’S DEPARTMENT patrol vehicle that Deputy Anthony Redondo was
26 driving in a reasonable and safe manner.

27 19. Plaintiffs are informed and believe, and thereon allege, that on June 26, 2021, including at the
28 time of impact, Plaintiff Manuel Orozco was a safe and careful driver of a vehicle that was being operated

1 by Plaintiff Manuel Orozco. On June 26, 2021 Deputy Anthony Redondo was driving an IMPERIAL
2 COUNTY SHERIFF'S DEPARTMENT patrol vehicle in an unreasonable and unsafe manner.

3 20. Plaintiffs are informed and believe, and thereon allege, that on June 26, 2021, Deputy
4 Anthony Redondo was negligently operating the IMPERIAL COUNTY SHERIFF'S DEPARTMENT patrol
5 vehicle by driving well in excess of the posted speed limit at or near the intersection of West Aten Road and
6 Forrester Roads in the unincorporated area of IMPERIAL COUNTY, and without the patrol vehicle's
7 emergency lights flashing or siren sounding, although all were fully functional and operational at the time.
8 The negligent and careless driving of the IMPERIAL COUNTY SHERIFF'S DEPARTMENT patrol vehicle
9 by Deputy Anthony Redondo caused the IMPERIAL COUNTY SHERIFF'S DEPARTMENT patrol vehicle
10 to crash into the vehicle driven by Plaintiff Manuel Orozco. Deputy Anthony Redondo was operating the
11 IMPERIAL COUNTY SHERIFF'S DEPARTMENT patrol vehicle in a reckless and dangerous manner and
12 in absolute disregard for the rights and safety of foreseeable motorists such as Plaintiffs.

13 21. Plaintiffs are informed and believe, and thereon allege, that Defendant COUNTY, and DOES
14 1-20 inclusive, on June 26, 2021, were responsible for maintaining and discharging law enforcement
15 services in IMPERIAL COUNTY including in the area at or near the intersection of West Aten Road and
16 Forrester Roads in the unincorporated area of Imperial County, California. As part of those law enforcement
17 services, Defendant COUNTY and DOES 1 through 20, inclusive, were aware that IMPERIAL COUNTY
18 SHERIFF'S DEPARTMENT deputies, such as Deputy Anthony Redondo, employed by Defendant
19 COUNTY, would be required to drive patrol vehicles through residential sections and neighborhoods, such
20 as near the intersection of West Aten Road and Forrester Roads in the unincorporated area of IMPERIAL
21 COUNTY. Defendant COUNTY has a non-delegable duty to ensure that civilian motorists are not injured
22 by deputy sheriffs driving sheriff's patrol vehicles while in the course of discharging law enforcement
23 services in IMPERIAL COUNTY, including in the area at or near the intersection of West Aten Road and
24 Forrester Roads in the unincorporated area of Imperial County, California.

25 22. Plaintiffs are informed and believe, and thereon allege, that, as a result of the aforementioned
26 negligent conduct, Deputy Anthony Redondo breached his duty to safely drive and control the IMPERIAL
27 COUNTY SHERIFF'S DEPARTMENT patrol vehicle that Deputy Anthony Redondo was driving in.

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1 23. As a direct and proximate result of the conduct of Deputy Anthony Redondo, Plaintiffs
2 sustained severe physical injuries and psychological damage.

3 24. As a legal, direct and proximate result of the conduct of Deputy Anthony Redondo, as
4 aforesaid, Plaintiffs, have sustained economic and noneconomic damages as a result of the negligence of
5 Deputy Redondo, acting on behalf of IMPERIAL COUNTY.

6 25. Plaintiffs are informed and believe, and thereon allege, that Deputy Anthony Redondo
7 engaged in the aforementioned conduct with a conscious disregard of the rights and safety of the public,
8 including Plaintiffs. Plaintiffs are further informed and believe, and thereon allege that Deputy Redondo
9 acted with malice in that he engaged in despicable conduct and in conscious disregard of the rights and
10 safety of Plaintiffs by knowingly or recklessly:

- 11 a. Operating the IMPERIAL COUNTY SHERIFF’S DEPARTMENT patrol vehicle in a
12 reckless manner and in conscious disregard for the rights and safety of any civilian
13 motorists on the road;
- 14 b. Operating the IMPERIAL COUNTY SHERIFF’S DEPARTMENT patrol vehicle in a
15 reckless manner that contravened and violated the policies and procedures of Defendant
16 COUNTY, as well as state and federal law;
- 17 c. Deliberately, intentionally, and/or recklessly driving the IMPERIAL COUNTY
18 SHERIFF’S DEPARTMENT patrol vehicle in excess of the posted speed limit on a street
19 without the vehicle’s emergency lights flashing or siren sounding;
- 20 d. Deliberately, intentionally and/or recklessly failing to apply the IMPERIAL COUNTY
21 SHERIFF’S DEPARTMENT patrol vehicle’s brakes prior to, and/or after the moment of
22 impact with the vehicle that PLAINTIFFS were driving.

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1 **III.**

2 **SECOND CAUSE OF ACTION**

3 **Negligent Hiring/Retention/Supervision/Training**

4 **By Plaintiffs Against DEFENDANT IMPERIAL COUNTY and DOES 1 through 20**

5 26. Plaintiffs re-allege and incorporate herein by reference each and every allegation and
6 statement contained in the prior paragraphs.

7 27. Plaintiffs are informed and believe, and thereon allege, that on June 26, 2021, Deputy
8 Anthony Redondo was acting within the course and scope of his employment with his employer, Defendant
9 IMPERIAL COUNTY. At the time the IMPERIAL COUNTY SHERIFF'S DEPARTMENT patrol vehicle,
10 driven by Deputy Anthony Redondo, collided, struck, and otherwise came into violent contact with
11 Plaintiffs, Deputy Anthony Redondo was speeding without the IMPERIAL COUNTY SHERIFF'S
12 DEPARTMENT patrol vehicle's headlights on, emergency lights flashing or siren sounding.

13 28. At all relevant times herein, and prior to June 26, 2021, Defendant COUNTY owed a duty to
14 the residents of IMPERIAL COUNTY in the proper hiring, retention, supervision, and training of their
15 agents and employees, such as Deputy Anthony Redondo, which the COUNTY assigned to operate
16 IMPERIAL COUNTY SHERIFF'S DEPARTMENT patrol vehicles.

17 29. Defendant COUNTY and DOES 1 through 20, inclusive, failed to act reasonably in the
18 hiring, retention, supervision and training of their agents and employees, including Deputy Anthony
19 Redondo, thereby breaching their duty to properly hire, properly retain, properly supervise, and properly
20 train Deputy Anthony Redondo in a professional manner, to protect the safety of the residents of IMPERIAL
21 COUNTY.

22 30. Plaintiffs are informed and believe, and thereon allege, that in doing the acts as heretofore
23 alleged, Defendant COUNTY and DOES 1 through 20, knew, or in the exercise of reasonable diligence
24 should have known, that Deputy Anthony Redondo was incompetent and unfit to perform the duties for
25 which she was employed, and that Deputy Anthony Redondo was a risk to persons such as Plaintiffs due to
26 his employment by the COUNTY. Specifically, Plaintiffs are informed and believe, and thereon allege, that
27 Defendant COUNTY and DOES 1 through 20 knew, or should have known, of Deputy Anthony Redondo's
28 lack of qualifications as a driver, which created an unreasonable risk of harm to foreseeable civilian

1 motorists, such as Plaintiffs herein. Further, Plaintiffs is informed and believes, and thereon alleges, that
2 Defendant COUNTY and DOES 1 through 20 knew, or should have known, of Deputy Anthony Redondo's
3 lack of qualifications as a deputy sheriff while on duty in IMPERIAL COUNTY SHERIFF'S
4 DEPARTMENT patrol vehicles.

5 33. Plaintiffs are informed and believe, and thereon allege, that despite this prior knowledge of
6 the unfitness of Anthony Redondo, Defendant COUNTY and DOES 1 through 20 negligently hired and
7 negligently retained Deputy Anthony Redondo as an employee.

8 34. Defendant COUNTY and DOES 1 through 20 negligently failed to properly supervise Deputy
9 Anthony Redondo which created an unreasonable risk of harm to foreseeable civilian motorists, such as
10 Plaintiffs herein.

11 35. Defendant COUNTY and DOES 1 through 20 negligently failed to properly train Deputy
12 Anthony Redondo which created an unreasonable risk of harm to foreseeable civilian motorists, such as
13 Plaintiffs herein.

14 36. As a direct and proximate result of the negligent conduct of Defendant COUNTY and DOES
15 1 through 20, Plaintiffs were caused to suffer severe injuries due to the reckless and unsafe driving of an
16 IMPERIAL COUNTY SHERIFF'S DEPARTMENT patrol vehicle by Deputy Anthony Redondo.

17 37. As a legal, direct and proximate result of the conduct of Deputy Anthony Redondo, and
18 DOES 1 through 20, Plaintiffs have sustained substantial economic and noneconomic damages as a result of
19 the negligence of Deputy Redondo, acting on behalf of IMPERIAL COUNTY, all to their general damages
20 in a sum in excess of the jurisdictional limits of this Court.

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22 **PRAYER FOR RELIEF**

23 Wherefore, Plaintiffs prays judgment against all Defendants as follows:

- 24 1. For general damages in an amount in excess of the jurisdictional minimum, according to proof;
- 25 2. For economic and noneconomic damages in an amount that is substantially in excess of the
26 jurisdictional minimum, according to proof;
- 27 3. For pre-trial interest, according to proof;
- 28 4. For prejudgment interest, according to proof ;

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5. For such other and further relief as this Court may deem just and proper.

Dated: November 30, 2021

CARRILLO LAW FIRM, LLP

By: 
MICHAEL S. CARRILLO
ATTORNEY FOR PLAINTIFFS

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury as to all cause of action.

Dated: November 30, 2021

CARRILLO LAW FIRM, LLP

By: 
MICHAEL S. CARRILLO
ATTORNEY FOR PLAINTIFFS