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Electronically FILED by  
Superior Court of California,  
County of Los Angeles  
7/30/2025 5:19 PM  
David W. Slayton,  
Executive Officer/Clerk of Court,  
By C. Coleman, Deputy Clerk

Attorneys for Plaintiff,  
*Sheri Zendejas, an Individual and Successor in Interest to Decedent Edel Quintero*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF LOS ANGELES**

SHERI ZENDEJAS, an Individual and  
Successor in Interest to Decedent Edel  
Quintero;

Plaintiff,

vs.

CITY OF LOS ANGELES; PACIFIC AREA  
BOOSTERS ASSOCIATION; RITE OF  
PASSAGE ADOLESCENT TREATMENT  
CENTERS AND SCHOOLS, INC.; and  
DOES 1 to 50 Inclusive,

Defendant(s).

CASE NO. **25SMCV03968**

**COMPLAINT FOR WRONGFUL  
DEATH AND SURVIVAL ACTION  
DAMAGES SOUNDING IN THE  
FOLLOWING CAUSES OF ACTION:**

1. **WRONGFUL DEATH**  
(CAL.GOVERNMENT CODE §§ 377.60,  
815.2(A), 820(A); CIVIL CODE, §43);
2. **NEGLIGENCE**
3. **NEGLIGENT SUPERVISION (AGAINST  
RITE OF PASSAGE)**
4. **DANGEROUS CONDITION OF PUBLIC  
PROPERTY (GOV. CODE § 835)**

**DEMAND FOR JURY TRIAL**

**COMES NOW**, Plaintiff, SHERI ZENDEJAS, an Individual and Successor in  
Interest to Decedent Edel Quintero and who complain and allege as follows against  
CITY OF LOS ANGELES; PACIFIC AREA BOOSTERS ASSOCIATION; RITE OF  
PASSAGE ADOLESCENT TREATMENT CENTERS AND SCHOOLS, INC.; and DOES  
1 through 50 Inclusive (hereinafter collectively referred to as "DEFENDANTS"), and  
complains and alleges as follows:

**I.**

**The Parties**

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1. Plaintiff, SHERI ZENDEJAS, is an individual residing in the city of Riverside, in the County of Riverside, State of California, and was at all relevant times Decedent's biological mother and legal successor in interest, who died on or about June 22, 2024.
2. Defendant CITY OF LOS ANGELES, at all times herein mentioned is a public entity organized and operating under the laws of the State of California, operating the LOS ANGELES POLICE DEPARTMENT (LAPD), and responsible for hosting, organizing, staffing, and securing public events.
3. Defendant PACIFIC AREA BOOSTERS ASSOCIATION at all times herein mentioned is a non-profit corporation organized and operating under the laws of the State of California.
4. Defendant RITE OF PASSAGE ADOLESCENT TREATMENT CENTERS AND SCHOOLS, INC. ("RITE OF PASSAGE") at all times herein mentioned is a non-profit corporation and licensed youth residential treatment provider conducting business in California.
5. Plaintiff is presently unaware of the true names and capacities of the DEFENDANTS sued herein as DOES 1 through 50, inclusive, and therefore sues these DEFENDANTS by such fictitious names. Plaintiff will amend this Complaint to allege their true names and capacities when ascertained. Plaintiffs are informed and believe, and based thereon, allege each of the DEFENDANTS designated as a "DOE" is legally responsible in some manner for the events and happenings herein alleged, and that Plaintiffs' damages as alleged herein were proximately caused by such DEFENDANTS.
6. Plaintiffs are informed and believe, and based thereon, allege that at all times material hereto, each DEFENDANT sued herein was the agent, servant, employer, employee, joint venture, contractor, partner, division owner, subsidiary, division, alias, and/or alter ego of each of the remaining DEFENDANTS and was, at all times, acting within the purpose and scope of

1 such agency, employment, contract, ownership, subsidiary, alias and/or alter  
2 ego and with the authority, consent, approval, control, influence and ratification  
3 of each remaining DEFENDANTS sued herein.

4 **II.**

5 **JURISDICTION AND VENUE**

- 6 7. Venue and jurisdiction is proper in this Court because the damages to  
7 Plaintiffs were caused by the wrongful acts and omissions by DEFENDANTS,  
8 all of which occurred within Los Angeles County, State of California.
- 9 8. The amount in controversy exceeds the jurisdictional minimum of this Court.
- 10 9. Plaintiffs are informed and believe and based thereon alleges that at all times  
11 herein mentioned, each defendant conspired with and aided and abetted each  
12 and every other defendant in committing the acts and omissions alleged herein.
- 13 10. Whenever and wherever reference is made to individuals who are not named  
14 as Plaintiffs or Defendants in this Complaint but were agents, servants,  
15 employees and/or supervisors of Defendant, such individuals at all relevant times  
16 acted on behalf of Defendants within the scope of their employment. Plaintiffs are  
17 informed and believe and thereon allege that Plaintiffs were owed a duty by each  
18 of said fictitiously named Defendants, and the injuries herein alleged arose out of  
19 and were proximately caused by the breach by the DOES 1 through 50 of that  
20 duty.

21 **III.**

22 **GOVERNMENT CLAIMS COMPLIANCE**

- 23 11. Plaintiff has complied with all government claim presentation  
24 requirements prior to filing this Complaint. On or about November 19, 2024,  
25 Plaintiff presented CITY OF LOS ANGELES with written claim forms pursuant to,  
26 and in substantial compliance with, California Gov. Claims Act (Gov. Code §§  
27 810 et seq.900 through 915.4). A true and correct copy of said claim forms is  
28 attached hereto as **Exhibit A.**

1 12. On or around February 7, 2025, CITY OF LOS ANGELES rejected Plaintiff's  
2 claims. A true and correct copy of said CITY rejection letter is attached hereto  
3 as **Exhibit B**.

4 **IV.**

5 **GENERAL ALLEGATIONS**

- 6 13. On or about June 22, 2024, at approximately 10:30 p.m., Decedent Edel  
7 Quintero, 16 years of age, attended the Pacific Area Boosters & Palms  
8 Weekend Festival, a public community event hosted and/or supervised by the  
9 Los Angeles Police Department (LAPD) and the PACIFIC AREA BOOSTERS  
10 ASSOCIATION, held within the jurisdiction and with the participation of LAPD  
11 officers.
- 12 14. Decedent attended the event as a resident of RITE OF PASSAGE, which had  
13 an established 10:00 p.m. curfew for all minor residents under its care.
- 14 15. Despite this policy, RITE OF PASSAGE allowed Decedent to remain at the  
15 event past curfew, failing to enforce its own rules or provide adequate  
16 supervision or retrieval.
- 17 16. Earlier in the evening, an unknown individual verbally threatened and  
18 harassed Decedent and a fellow resident. LAPD officers and event personnel  
19 were present and failed to intervene or remove the aggressor.
- 20 17. Later that night, the same individual returned to the event, approached  
21 Decedent, and violently stabbed him, inflicting fatal injuries.
- 22 18. Multiple eyewitnesses reported that, after the stabbing, LAPD personnel  
23 prevented others from rendering aid to Decedent, despite visible bleeding and  
24 apparent distress. As a result, Decedent bled out at the scene and died.
- 25 19. The conduct of LAPD, CITY OF LOS ANGELES, PACIFIC AREA BOOSTERS  
26 ASSOCIATION, Inc. and RITE OF PASSAGE collectively and independently  
27 created or failed to mitigate foreseeable risks, and their respective breaches of  
28 duty were substantial factors in causing Decedent's death.

1 **FIRST CAUSE OF ACTION**

2 **WRONGFUL DEATH**

3 **(By All Plaintiffs as Against All Defendants, and DOES 1-50 Inclusive)**

4 (Against All Defendants)

5 20. Plaintiff re-alleges and incorporates each of the preceding paragraphs as  
6 though fully set forth herein.

7 21. At all times herein mentioned, Plaintiff was the biological parent of Decedent.

8 22. As a further direct and proximate cause of the death of Decedent, Plaintiffs  
9 have been permanently deprived of Decedent's love, care, companionship,  
10 comfort, services, society, solace, contributions, physical assistance, affection  
11 and moral support, all to their damage in an amount in excess of the minimum  
12 jurisdiction of this court and according to proof.

13 23. By reason of DEFENDANTS' conduct, Plaintiff has incurred funeral and burial  
14 expenses in such amounts as will be proven at the time of the trial. Plaintiff  
15 has lost the use of interest on the money owed, from the dates of Decedent's  
16 death until judgment as follows: funeral and burial expenses, loss of support,  
17 pecuniary value of the loss of love, care, companionship, comfort, services,  
18 society, solace and moral support.

19 24. Plaintiff seeks prejudgment interest as prescribed by California law upon any  
20 and all damages sustained as herein above alleged.

21 **SECOND CAUSE OF ACTION**

22 **NEGLIGENCE**

23 **(By All Plaintiffs as Against All Defendants, and DOES 1-50 Inclusive)**

24 25. Plaintiff re-alleges and incorporates each of the preceding paragraphs as  
25 though fully set forth herein.

26 26. All Defendants owed Decedent a duty to act reasonably and protect him from  
27 foreseeable harm. This includes:

- 28 - LAPD's duty to manage and secure the event;

1 - RITE OF PASSAGE's duty to supervise minor residents and enforce  
2 curfews.

3 27. These duties were breached through:

- 4 - Failure to intervene after the first altercation;
- 5 - Permitting the aggressor to re-enter the venue;
- 6 - Preventing others from administering medical care;
- 7 - Allowing Decedent to stay past curfew without protection.

8 28. Public employees in California are statutorily liable to the same extent as  
9 private persons for injuries caused by their acts or omissions, subject to the  
10 same defenses available to private person. *Gov. Code 820.*

11 29. Also, "a public entity is liable for injury proximately caused by an act or  
12 omission of an employee of the public entity within the scope of his  
13 employment, if the act or omission would have given rise to a cause of action  
14 against that employee or his personal representative." *Gov. Code 815.2(a).*

15 30. Additionally, as the owners of the property, CITY OF LOS ANGELES;  
16 PACIFIC AREA BOOSTERS ASSOCIATION; and Does 1 through 50, had a  
17 duty under *Gov. Code 840.2* to ensure that the property was safe from  
18 dangerous conditions that create a substantial risk of injury when the property  
19 is used in a foreseeable way. Prohibiting individuals into the festival who are  
20 carrying knives or other deadly weapons is decidedly a mandatory, non-  
21 discretionary duty imposed upon administrators and security personnel  
22 pursuant to municipal codes and California law.

23 31. As part of this mandatory duty, DEFENDANTS, and each of them, were  
24 required to act reasonably when supervising the festival and its' attendees, to  
25 adequately train and supervise those who were to provide security, to provide  
26 screening equipment that detects concealed weapons and to adequately staff  
27 security during and after the festival. DEFENDANT'S failure to supervise its  
28 premises, to adequately train and supervise those who were to provide

1 security and to adequately staff security to protect attendees on the festival  
2 premises during and after the event resulted in Decedent sustaining fatal  
3 injuries.

4 32. As a direct and proximate cause of DEFENDANTS' actions and omissions,  
5 Decedent was stabbed on festival premises, ultimately causing his death.

6 33. Decedent's death was a direct and proximate result of the wrongful acts and  
7 omissions the DEFENDANTS, and each of them. Tragically, Decedent, by his  
8 death, left various relatives, including, the Plaintiff herein, all of whom have  
9 been caused great losses. As a result of Decedent's death, Plaintiff has been  
10 caused to lose, among other things, the love, affection, support, comfort,  
11 society and/or financial support and more from the Decedent and incurred bills  
12 and out of pocket damages and losses, to their great detriment.

13 34. As a further direct and proximate result of the conduct of DEFENDANTS, and  
14 each of them, Plaintiffs have incurred medical, funeral and burial expenses,  
15 have lost gifts and other economic benefits that they expected to receive from  
16 Decedent, all to Plaintiffs' economic damages in a sum which will be  
17 established according to proof at trial.

18 **THIRD CAUSE OF ACTION**

19 **NEGLIGENT SUPERVISION**

20 **(By All Plaintiffs as Against RITE OF PASSAGE, and DOES 1-50 Inclusive)**

21 35. Plaintiff re-alleges and incorporates each of the preceding paragraphs as  
22 though fully set forth herein.

23 36. Public employees in California are statutorily liable to the same extent as  
24 private persons for injuries caused by their acts or omissions, subject to the  
25 same defenses available to private persons. Gov. Code 820.

26 37. Also, "a public entity is liable for injury proximately caused by an act or  
27 omission of an employee of the public entity within the scope of his  
28 employment, if the act or omission would have given rise to a cause of action

- 1 against that employee or his personal representative.” Gov. Code 815.2(a).
- 2 38. RITE OF PASSAGE had a custodial relationship with Decedent and owed him
- 3 a heightened duty of care.
- 4 39. By failing to enforce curfew, monitor Decedent’s whereabouts, ensure
- 5 adequate security was present or retrieve him from the event, RITE OF
- 6 PASSAGE abdicated its supervisory obligations, contributing to the
- 7 circumstances of his death.
- 8 40. As a direct and proximate result of the conduct and omissions by
- 9 DEFENDANTS, Plaintiff has sustained a devastating loss due to the death of
- 10 Decedent. They have suffered from the loss of Decedent’s love,
- 11 companionship, comfort, care, assistance, society, protection, moral support,
- 12 and guidance, all to Plaintiffs’ non-economic damages in a sum within the
- 13 jurisdiction of this Court and which will be established according to proof at
- 14 trial.
- 15 41. As a further direct and proximate result of the conduct of DEFENDANTS,
- 16 Plaintiff has incurred medical, funeral and burial expenses, have lost gifts and
- 17 other economic benefits that they expected to receive from Decedent, all to
- 18 Plaintiffs’ economic damages in a sum which will be established according to
- 19 proof at trial.

20 **FOURTH CAUSE OF ACTION**

21 **DANGEROUS CONDITION OF PUBLIC PROPERTY (Gov. Code § 835)**

22 **(By All Plaintiffs as Against CITY OF LOS ANGELES, and DOES 1-50**

23 **Inclusive)**

24 **(Against All Defendants)**

- 25 42. Plaintiff re-alleges and incorporates each of the preceding paragraphs as
- 26 though fully set forth herein.
- 27 43. At all times herein mentioned, Plaintiff was the biological parent of Decedent.
- 28 44. The festival venue became a dangerous condition due to inadequate security,

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poor crowd control, and LAPD’s failure to respond to earlier threats.

45. The CITY OF LOS ANGELES had actual or constructive notice of the risk of violence and failed to take protective measures, including removal of the aggressor and proper emergency response protocols.

46. These conditions proximately caused Decedent’s injuries and death.

47. As a further direct and proximate cause of the death of Decedent, Plaintiff has been permanently deprived of Decedent’s love, care, companionship, comfort, services, society, solace, contributions, financial support, physical assistance, affection and moral support, all to their damage in an amount in excess of the minimum jurisdiction of this court and according to proof.

48. By reason of DEFENDANTS’ conduct, Plaintiff has incurred funeral and burial expenses in such amounts as will be proven at the time of the trial. Plaintiffs have lost the use of interest on the money owed, from the dates of Decedent’s death until judgment as follows: funeral and burial expenses, loss of support, pecuniary value of the loss of love, care, companionship, comfort, services, society, solace and moral support.

49. Plaintiffs seek prejudgment interest as prescribed by California law upon any and all damages sustained as herein above alleged.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully prays for judgment against DEFENDANTS, and each of them, as follows:

- 1. For compensatory and general damages according to proof;
- 2. For special and incidental damages according to proof;
- 3. For economic and non-economic damages according to proof; and
- 4. For costs of suits incurred herein;
- 5. For such other and further relief as the court deems just and proper.

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Plaintiffs hereby demand a trial by jury on all claims so triable.

**JURY DEMAND**

**THE BARNES FIRM, LC**

Dated: July 30, 2025

By: *Scott A Kennedy*  
SCOTT A. KENNEDY, ESQ.  
Attorneys for Plaintiff,  
*Sheri Zendejas*

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**Exhibit "A"**

## CLAIM FOR DAMAGES TO PERSON OR PROPERTY

<p><b>INSTRUCTIONS:</b></p> <ol style="list-style-type: none"> <li>1. Claims for death, injury to person or to personal property must be filed not later than six months after the occurrence. (Gov. Code Sec. 911.2)</li> <li>2. Claims for damages relating to any other type of occurrence must be filed not later than one year after the occurrence. (Gov. Code Sec. 911.2)</li> <li>3. Read the entire claim and fill out all mandatory fields (* = mandatory) before filing. (Gov. Code Sec. 910, 910.2) <b>THE FAILURE TO INCLUDE MANDATORY INFORMATION MAY RESULT IN YOUR CLAIM BEING RETURNED AS INSUFFICIENT.</b> (Gov. Code Sec. 910.8)</li> <li>4. If necessary, attach separate sheets to provide full details, referencing the appropriate claim section number. <b>SIGN EACH SHEET.</b></li> <li>5. Attach any relevant documents or reports supporting your claim.</li> <li>6. Claim must be signed at the bottom of page 2.</li> <li>7. Claims can only be filed with the City Clerk. (Gov. Code Sec. 915a) Claims can be filed online at <a href="https://claims.lacity.org/">https://claims.lacity.org/</a>, in person or mailed to: CITY CLERK, 200 NORTH SPRING STREET, ROOM 395, CITY HALL, LOS ANGELES, CA 90012</li> <li>8. <b>FAXED OR EMAILED CLAIMS WILL NOT BE ACCEPTED.</b></li> </ol>	<p style="text-align: center;">RESERVE FOR FILING STAMP CLAIM NO. _____</p>
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**TO: CITY OF LOS ANGELES**

<p><b>1. CLAIMANT INFORMATION:</b></p> <p>*Name: <u>Sheri Zendejas</u> Date of Birth: _____</p> <p>Email Address: _____ *Phone Number: <u>(951) 617-2300</u></p> <p>*Address: <u>383 Buchanan Street, Space 56, Riverside, CA 92503</u></p> <p><input checked="" type="checkbox"/> Indicate if claim notices or communications should be sent to someone other than the claimant (e.g. attorney or insurance representative). <b>If checked, complete the information below:</b></p> <p>*Name: <u>Mory Ahmadi</u> *Relationship to Claimant: <u>Attorney</u></p> <p>Email Address: <u>mory.ahmadi@thebarnesfirm.com</u> *Phone Number: <u>(800) 800-0000</u></p> <p>*Address: <u>633 W. Fifth Street, Suite 1750, Los Angeles, CA 90071</u></p>
<p><b>2. FACTUAL ALLEGATIONS:</b></p> <p>*How did damage or injury occur?</p> <p>Wrongful death of claimant's son, Edel Anthony Quintero. Edel Anthony Quintero was killed due to stab wound of chest caused by an individual at a fundraising carnival for Los Angeles Police Department youth programs at or around Venice Blvd and Keystone Ave. Sheri Zendeas has a wrongful death claim for the death of her son, Edel Anthony Quintero, caused by an individual who stab her son resulting in his death.</p> <hr/> <p>*Please provide the date and time of the damage or injury. <u>June 22, 2024 on or about 10:30PM</u></p> <p>*Where did damage or injury occur? Please provide the closest street address or cross-street and use the diagram on page 2. <u>Venice Blvd and Keystone Ave., Los Angeles, CA</u></p> <p>*Why do you claim the City of Los Angeles is responsible for your damage or injury? <u>Please see attachment.</u></p>

**SEE PAGE 2 (OVER)**

**THIS CLAIM MUST BE SIGNED ON REVERSE SIDE**

**3. WITNESSES AND INVOLVED PARTIES:**

\*Give the names of City employees and their contact information, City vehicle license plate numbers, and the City department or bureau responsible for the act or omission you claim caused the damage or injury, if known.

Los Angeles Police Department

Did you report the act or omission? If so, please identify who you reported it to, provide their contact information and any report, service or claim numbers.

Unknown who reported the incident. There is a pending police investigation.

Please list the names and contact information for Witnesses, Doctors and Hospitals

**4. DAMAGES:**

\*What damage or injuries do you claim resulted? Stab wound of chest

\*What is the total amount of your claim: \$ 10,000,000

\*Itemize your damages:  Property Damages: \$ \_\_\_\_\_  Bodily Injury: \$ 10,000,000

Other (specify) \_\_\_\_\_ : \$ \_\_\_\_\_

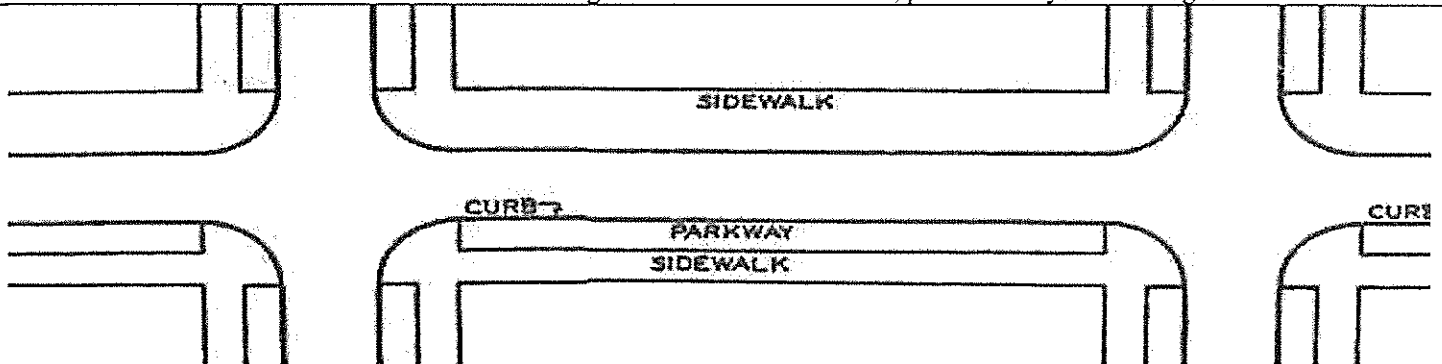
Attach any relevant documents or reports supporting your claimed damages.

**5. INSURANCE:**

If you had insurance at the time of the act or omission, please give the name and contact information for your insurance company, handling representatives and any amounts paid:

**6. ACCIDENT DIAGRAM:**

For all accident claims, place the street names where the accident occurred and the nearest cross-streets on the diagram, while indicating the location of the accident with an "X". Note: if the diagram does not fit the situation, please attach your own diagram.



I declare under penalty of perjury that the foregoing, including any attachments, is true and correct:

[Signature]  
\*Signature of Claimant or Person Filing  
on Claimant's Behalf

Mory Ahmadi  
Print Name

11/19/2024  
Date

Attorney for Claimant  
Relationship to Claimant

CRIMINAL PENALTY FOR PRESENTING A FALSE OR FRAUDULENT CLAIM IS IMPRISONMENT OR FINE OR BOTH. (PENAL CODE §72)

## **SUPPLEMENTAL CLAIM INFORMATION**

**Re: Edel A. Quintero (Deceased)**

**Sheri Zendejas (Wrongful Death Damages related to the death of her son, Edel Anthony Quintero)**

### **1. NAMES OF CLAIMANT:**

- a. Sheri Zendejas (mother of decedent, Edel A. Quintero)  
Address: 3883 Buchanan Street, Space 56, Riverside, CA 92503

**Claimant is represented by an attorney. All correspondence should be sent directly to:**

**ATTN: Mory Ahmadi  
The Barnes Firm  
633 W. Fifth Street, Suite 1750  
Los Angeles, CA 90071  
Phone: 800-800-0000 Fax: 888-800-7050**

### **CIRCUMSTANCES THAT LED TO DAMAGE OR INJURY:**

This claim arises out of a fatal stabbing which occurred at or around 10:30 pm on June 22, 2024, in or around the areas of Venice Blvd and Keystone Ave. That night, claimant's decedent, sixteen year old Edel A. Quintero was at a Los Angeles Police Department fundraiser. There was an earlier altercation with "multiple" juveniles and Edel A. Quintero was later stabbed in the chest by an unknown male juvenile who was involved in the altercation. The Los Angeles Police Department fail to control the location of the accident site and provide timely emergency care which resulted in the death of EDEL A. QUINTERO.

### **EXPLAIN WHY YOU BELIEVE THE CITY IS RESPONSIBLE FOR THE DAMAGE OR INJURY:**

Claimant further contends that the Los Angeles Police Department were negligently trained and retained by the Los Angeles Police Department and the City of Los Angeles in that they had known propensities for acting in the fashion that they did with respect to this incident, all of which was a proximate cause of injuries to the decedents and to all claimants. Witnesses will confirm that following the stabbing, the involved officers denied medical care to Edel Anthony Quintero in a manner that demonstrated deliberate indifference to his constitutional rights. Additionally, claimant contends that the decedent's death and claimant's injuries were the proximate result of unconstitutional policies and customs of the Los Angeles Police Department and the City of Los Angeles.

As a result of the above alleged conduct, claimant and the decedent, and the decedent's estate will bring causes of action which include but are not limited to: wrongful death, negligence, negligent hiring, negligent training, negligent supervision, intentional infliction of emotional distress, negligent infliction of emotional distress, and federal and state civil rights violations, among other claims.

**GENERAL DESCRIPTION OF THE INDEBTEDNESS, OBLIGATION, INJURY, DAMAGE, OR LOSS. SO FAR IS PRESENTLY KNOWN:**

As a result of the above facts, claimant and the decedent have suffered injuries to their minds and bodies including, but not limited to, being unjustifiably denied medical care and treatment, being deprived of the love, comfort and society of close family members, in addition to severe emotional distress, and civil rights violations, among other claims.

**THE NAME(S) OF THE PUBLIC EMPLOYEE(S) CAUSING THE INJURY, DAMAGE, OR LOSS:**

Heretofore unknown Los Angeles Police Department Officers employed by the Los Angeles Police Department and the City of Los Angeles.

**THE AMOUNT CLAIMED:**

Unspecified amount but in excess of \$10,000,000 and within the jurisdiction of the Superior Court of California.

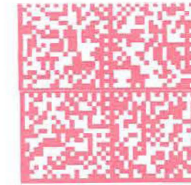


633 West Fifth St, Suite 1750  
Los Angeles, CA 90071

**CERTIFIED MAIL**



7022 2410 0002 0714 3010



quadiant  
FIRST-CLASS MAIL  
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**\$009.64**<sup>g</sup>  
11/19/2024 ZIP 90071  
043M30215969

**US POSTAGE**

**CITY CLERK  
200 North Spring Street, Room 395, City  
Hall  
Los Angeles, CA 90012**



633 West Fifth St, Suite 1750  
Los Angeles, CA 90071



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FIRST-CLASS MAIL  
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11/19/2024 ZIP 90071  
043M30215969

**US POSTAGE**

**CITY CLERK  
200 North Spring Street, Room 395, City  
Hall  
Los Angeles, CA 90012**





February 7, 2025

THE BARNES FIRM, L.C. / MORY AHMADI, ESQ.  
633 W. FIFTH ST., SUITE 1750  
LOS ANGELES, CA 90071

RE: Our Claim No.: **C25-03410**  
Your Client/Insured: **SHERI ZENDEJAS**  
Date of Loss: **06/22/2024**

Dear Sir/Madam:

The subject claim against the City has been referred to this office.

After reviewing the circumstances of the claim and the applicable law, it has been determined that the claim should be denied.

This letter represents a formal notice to you that said claim has been denied. In view of this action, we are required by law to give you the following warning:

**\*\*\*WARNING\*\*\***

**"Subject to certain exceptions, you have only six (6) months from the date this notice was personally delivered or deposited in the mail to file a court action alleging state causes of action. The time within which federal causes of action must be filed is governed by federal statutes."**

**"You may seek the advice of an attorney of your choice in connection with this matter. If you desire to consult an attorney, you should do so immediately."**

Very truly yours,

Brian Sam  
Chief Investigator

BRSAM ; DENNAS  
Telephone: 213-978-7081  
Enclosure(s)

## PROOF OF SERVICE BY MAIL

I, Dena Nasih, declare as follows:

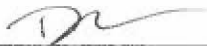
I am over the age of 18 years and not a party to this action. My business address is 200 North Main Street, Room 600, City Hall East, Los Angeles, California 90012, which is located in the county where the mailing described below took place.

I am readily familiar with the business practice at my place of business for collection and processing correspondence for mailing via the United States Postal Service. Correspondence so collected and processed is deposited with the United States Postal Service that same day in the ordinary course of business.

On February 7, 2025, at my place of business at Los Angeles, California, I mailed a Denial Letter for Claim Number C25-03410 by placing it, with postage thereon fully prepaid, for collection and mailing via the United States mail addressed as follows:

THE BARNES FIRM, L.C. / MORY AHMADI, ESQ.  
633 W. FIFTH ST., SUITE 1750  
LOS ANGELES, CA 90071

I declare under penalty of perjury that the following is true and correct. Executed on February 7, 2025, at Los Angeles, California.



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Dena Nasih