

CLAIM FOR DAMAGES TO PERSON OR PROPERTY

FILED
2007 JUN 11 AM 10:13
BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES



INSTRUCTIONS:

1. Read claim *thoroughly*.
2. Fill out claim as indicated; attach additional information if necessary.
3. This office needs *three copies* of your claim and *three sets* of attachments (if any).
4. This claim form *must* be signed.

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

TIME STAMP HERE
OFFICE USE ONLY

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| 1. NAME OF CLAIMANT Pamela Richardson | | 10. WHY DO YOU CLAIM COUNTY IS RESPONSIBLE? See Attachment | |
| 2. ADDRESS AND TELEPHONE NUMBER TO WHICH YOU DESIRE NOTICES OR COMMUNICATIONS TO BE SENT: Street _____ City, State _____ Zip Code _____ | | 11. NAMES OF ANY COUNTY EMPLOYEES (AND THEIR DEPARTMENTS) INVOLVED IN INJURY OR DAMAGE (IF APPLICABLE): | |
| HOME TELEPHONE: () _____ BUSINESS: () _____ | 3. CLAIMANT'S BIRTHDATE: 12/04/55 | | NAME: Lee Baca DEPT.: Sherriff |
| 4. CLAIMANT'S SOCIAL SECURITY NUMBER: _____ | | NAME: Unknown Deputies DEPT.: Sherriff | |
| 5. WHEN DID DAMAGE OR INJURY OCCUR? DATE: 2/28/07 to 3/21/07 TIME: _____ | | 12. WITNESSES TO DAMAGE OR INJURY: LIST ALL PERSONS AND ADDRESSES OF PERSONS KNOWN TO HAVE INFORMATION: | |
| 6. WHERE DID DAMAGE OR INJURY OCCUR? Century Regional Detention Center Street _____ City, State _____ Zip Code _____ Lynwood, CA | | NAME: See Attachment | PHONE: _____ |
| 7. DESCRIBE IN DETAIL HOW DAMAGE OR INJURY OCCURRED: See Attachment | | ADDRESS: _____ | NAME: _____ PHONE: _____ |
| 8. WERE POLICE OR PARAMEDICS CALLED? YES <input type="checkbox"/> NO <input type="checkbox"/> | | ADDRESS: _____ | NAME: _____ PHONE: _____ |
| 9. IF PHYSICIAN WAS VISITED DUE TO INJURY, INCLUDE DATE OF FIRST VISIT AND PHYSICIAN'S NAME, ADDRESS AND PHONE NUMBER: DATE OF FIRST VISIT: 03/22/2007 PHYSICIAN'S NAME: _____ PHYSICIAN'S ADDRESS: _____ PHONE: () _____ | | 13. LIST DAMAGES INCURRED TO DATE (and attach copies of receipts or repair estimates): See Attachment | |
| TOTAL DAMAGES TO DATE: \$ _____ | | TOTAL ESTIMATED PROSPECTIVE DAMAGES: \$ 1,000,000 + | |

THIS CLAIM MUST BE SIGNED
NOTE: PRESENTATION OF A FALSE CLAIM IS A FELONY (PENAL CODE SECTION 72.)

WARNING

- 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)
- SUBJECT TO CERTAIN EXCEPTIONS, YOU HAVE ONLY SIX (6) MONTHS FROM THE DATE OF THE WRITTEN NOTICE OF REJECTION OF YOUR CLAIM TO FILE A COURT ACTION. (GOVERNMENT CODE SECTION 945.6)
- IF WRITTEN NOTICE OF REJECTION OF YOUR CLAIM IS NOT GIVEN, YOU HAVE TWO (2) YEARS FROM ACCRUAL OF THE CAUSE OF ACTION TO FILE A COURT ACTION. (GOVERNMENT CODE SECTION 945.6)

| | |
|--|--|
| 14. SIGNATURE OF CLAIMANT OR PERSON FILING ON HIS/HER BEHALF GIVING RELATIONSHIP TO CLAIMANT: Attorney | 15. PRINT OR TYPE NAME Samuel J. Wells |
| | DATE 6/11/07 |

ATTACHMENT TO TORT CLAIM

1. Ms. Richardson complains that the County, its Sheriff, and his deputies, violated her rights to be free from racial discrimination, disability discrimination, and equal protection of the laws. Ms. Richardson complains that she, as an African American female and a person suffering from a disability, was treated like a sub-human, while the County, its Sheriff, and his deputies gave completely different treatment to others, including Paris Hilton, a Caucasian female with an alleged disability and/or medical condition.

2. Ms. Richardson is a 51 year old African American female. As a result of an accident while Ms. Richardson was in the armed forces, she suffered a double amputation of her legs. Her right leg was reattached, but never fully recovered, and remains weak. She wears a prosthetic replacement on her left leg.

3. Ms. Richardson was arrested on February 28, 2007 by the Los Angeles Police Department.

4. On or about March 1, 2007, Ms. Richardson was transported to the Century Regional Detention Center, a public jail facility operated by the County and the County Sheriff (hereinafter "the Lynwood County Jail"). She was left hand-cuffed to a guerny, and told that the County and its deputy sheriffs were attempting to determine what to do with her.

5. Ms. Richardson slept on the guerny, and when she sat up the guerny overturned, and she was injured, sustaining what was later diagnosed as a hernia. Although Ms. Richardson reported this to the deputies, she received no medical treatment for the hernia.

6. On or about March 2, 2007, the deputies took from her her prosthesis, which she desperately needed in order to move from one place to another, telling her that it could be used as a weapon. Instead, at that time she was given a wheelchair. She told the deputies that pushing the wheels of the wheelchair made her feel like something was "tearing" inside of her (her hernia), but she was ignored. This treatment was in direct contrast to the treatment given Ms. Hilton.

7. Ms. Richardson then was placed in a jail cell. She found that she was unable to shower in the jail showers, because the wheelchair would not fit in the shower. She told the deputies of this, and was ignored. In fact, she was told that she would have to "crawl your fat ass on the floor."

8. The next day Ms. Richardson again complained of not being able to bathe. She was told to "hop" to the shower. She told the deputies that she could not do this, because of the weakness of her ~~right~~^{left} leg. She was again ignored. Instead, she was told "this ain't no Marriott."

9. Ms. Richardson was unable to bathe herself for over 8 days.

10. On or about the 3rd day that Ms. Richardson occupied her cell, she was again seen by a doctor in the jail facility. He again directed that she needed to go to the county hospital to be treated for her hernia, which he now described to her as "ripped."

11. However, she was not allowed to go the hospital. Instead, the County, the Sheriff and its deputies refused to provide her the medical care she needed.

12. The doctor at the Lynwood County Jail issued several orders that Ms. Richardson be allowed to use her prosthetic device. The County, its Sheriff and his deputies ignored them all, and refused to allow Ms. Richardson to receive the medical care she needed.

13. Eventually, Ms. Richardson was allowed to shower in the medical facility at the Lynwood County Jail. However, immediately thereafter, the deputies removed her wheelchair at night. As a result, denied the medical treatment and disability accomodation she needed, Ms.

Richardson was forced to crawl like an animal if she needed to use the toilet at night.

14. Over the course of time, Ms. Richardson filed approximately 5 complaints on County complaint forms about her treatment on the guerney, not being allowed to shower, having her wheelchair removed, being refused medical treatment in the form of the wheelchair, and being refused medical treatment for her hernia. All were ignored.

15. Ms. Richardson complained that not receiving the medication that she needed, and the pain from the hernia, was affecting her mental condition. The medication which she needed included medication for a previous bout of cancer. In apparent retaliation for filing these complaints, instead of accomodating Plaintiff's disability and providing the medical care she needed, the County, the Sheriff and his deputies transferred Ms. Richardson to a ward for those with mental problems. In this ward, she was not allowed to use a wheelchair at all, and could not shower.

16. Ms. Richardson also suffers from high blood pressure, and takes medication to mitigate this medical condition. Although she had received her medication before being placed in the mental ward, in apparent retaliation for her complaints, she received no medication after she was placed there. As a result, Ms. Richardson became ill. Moreover, her hernia worsened, and she began to vomit.

17. At one point, Plaintiff's began to suffer symptoms from the failure of the County, its Sheriff, and his deputies to provide her with the medication which she needed.

18. This treatment was, again, in direct contrast to the treatment provided to Paris Hilton, who was placed in a special medical facility and provided every type of medical care which she contended was required.

19. On March 19, 2007, Ms. Richardson was returned to court. While entering the court, her wheelchair caused her to fall, due to the careless handling of one of Defendants.

21. On March 20, 2007, Ms. Richardson was told she would be extradicted. On the same day, a deputy flung her food next to the toilet, and told her to crawl to it. Indeed, on a number of occasions while in the mental ward, she was told to crawl to the toilet. Ms. Richardson felt humiliated, and that she was being treated like an animal.

22. On March 21, 2007, Ms. Richardson received no food. In the afternoon, Ms. Richardson was given her prosthetic devise, which was ^{new} broken and unusable.

23. She was released the same day. However, because her prosthetic device was broken, when she arrived home, she was forced to crawl from the taxi to her home.

24. As a result, Ms. Richardson has suffered terrible humiliation, embarassment and emotional pain. She further has suffered serious physical injury and pain. She currently is being treated at the Veteran's Administration for her hernia, and may require surgery. Her prosthesis has had to be completely replaced, at a cost of over \$50,000.00.

CONTACT: GLORIA ALLRED
(323) 653-6530

Today we have filed a legal claim against the L.A. County Sheriff and L.A. County on behalf of our client, Pamela Richardson, an African American woman, age 51, who was recently arrested and incarcerated at Century Regional Center in Lynwood, California. We allege that while in custody, Ms. Richardson who had serious medical issues, was treated far worse than Paris Hilton and that our client was discriminated against because of her race and disability. Further, she was denied the equal protection of the law which is her civil and constitutional right.

On February 28, 2007, Ms. Richardson was arrested by the LAPD. On or about March 1, 2007, she was transported to Century Regional Detention Center.

As a result of an accident when Ms. Richardson was in the armed forces years earlier, she suffered a double amputation of her legs. Her left leg was reattached but it never fully recovered and remains weak. She wears a prosthetic replacement on her right leg and a brace on her left leg.

While at Century Regional her prosthetic device and leg brace, which were in good condition, were removed from her, although she desperately needed them to move from one place to another.

Instead, at first she was handcuffed to a gurney where she slept and when she sat up the gurney overturned and she was injured suffering a hernia. Although she reported this she received no medical treatment for the hernia.

She was provided a wheelchair but she told the deputies that pushing it made her feel something was tearing inside of her (her hernia). Her complaint was ignored, in direct contrast to Ms. Hilton who was provided full medical treatment for her medical needs.

At the jail, Ms. Richardson told the deputies that she was unable to shower in the jail shower because her wheelchair would not fit in the shower. Instead of receiving assistance she was told "Crawl your fat ass on the floor". Another day when she complained she was told to hop to the shower, but she told the deputies she could not do that because of the weakness in her left leg. The deputy's response was "This ain't no Marriott". As a result, Ms. Richardson was unable to bathe herself for over 8 days.

Although the jail doctor issued several orders that Ms. Richardson be allowed to use her prosthetic device those orders were ignored and she never received it or her brace until she was released from jail.

Although she was sometimes permitted to use a wheelchair in her cell, it was sometimes removed at night. As a result she was forced to crawl like an animal if she needed to use the toilet at night.

Ms. Richardson filed 5 complaints while incarcerated. She complained of her treatment on the gurney, not being allowed to shower, having her wheelchair removed and being refused medical treatment for her hernia as well as being denied medication she needed as a result of having suffered from cancer.

In apparent retaliation for filing these complaints, the County, and Sheriff's deputies, transferred Ms. Richardson to a ward for those with mental problems. There her

medical condition worsened as her hernia went untreated and she was denied the medication that she needed.

In addition, in the mental ward she was not allowed to use a wheelchair at all and could not shower. This was in direct contrast to Paris Hilton who was provided every type of medical care that she required.

On March 20, 2007, a deputy flung Ms. Richardson's food next to the toilet and told her to crawl to it. On a number of occasions while in the mental ward, she was also told to crawl to the toilet. Ms. Hilton never received such treatment.

On March 21, 2007, she was given her prosthesis at the jail and released from custody. They never returned her brace. The prosthesis was broken in pieces and severely damaged. She never received an explanation as to how it became broken while it was in the custody of the deputy sheriffs.

They opened the door to the jail and let her hobble out of the jail to a taxi. When she arrived home, because the prosthesis was broken, she needed the assistance of the taxi driver to hobble into her home.

Although arrested by the L.A.P.D., Ms. Richardson was not prosecuted. As a result of her mistreatment while in custody, she has suffered serious physical and emotional harm and extreme humiliation.

She is now being treated for her hernia at the Veteran's Administration in Los Angeles.

When Paris Hilton was remanded to jail on Friday, she cried out "It's not right!" We say about the shocking, revolting and discriminatory treatment of our client, Pamela – "It's not right!"

It's not right that a young, white celebrity female should receive the medical care that she needs in the L.A. County jail system, but an older African American woman who was not well known receives inadequate and substandard medical treatment.

It's not right and L.A. County needs to investigate and change their policy and practices. We want Paris to receive the medical care she needs but we want every inmate to receive that same high standard of care.

We hope that as a result of the legal step we are taking and plan to take that every inmate will receive the appropriate medical care that Paris was afforded at Century Regional and at Twin Towers. Paris matters but so do they. We look forward to the County's response.

GLORIA ALLRED

SAM WELLS

Attorneys at Law

June 11, 2007

Contact: Gloria Allred
(323) 653-6530

STATEMENT OF PAMELA RICHARDSON

It was very upsetting to me to have both my prosthesis and my leg brace taken away from me when I entered Century Regional Detention Center. I only received my prosthesis after I was released. I never received the brace.

To have been in custody during those three weeks and to have to crawl at night to the toilet and be told to crawl to the shower was very humiliating. I felt that all my dignity was taken from me.

I know I am not Paris Hilton, but I am a human being with medical needs and I don't understand why I was treated in the way that I was.

Medically speaking it made me sicker not to be able to walk and take care of myself.

Without my prosthesis and brace, I couldn't even carry my own food tray or take a shower and take care of other hygiene needs.

It was shocking to be treated and mistreated in the way that I was.

I hope what happened to me never happens to anyone else.

PAMELA RICHARDSON

June 11, 2007

Represented by

Attorney Gloria Allred

and

Attorney Sam Wells