

MINUTES OF THE BOARD OF SUPERVISORS  
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA



**14.4**

During the oral communication section of the agenda for Tuesday, September 25, 2012, Juan Jara spoke regarding a claim filed of incident in Moreno Valley.

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**ATTACHMENTS FILED WITH  
CLERK OF THE BOARD**

**AGENDA NO.  
14.4**

1 Luis A. Carrillo, Esq., SBN-70398  
2 **LAW OFFICES OF LUIS A. CARRILLO**  
3 1525 Fair Oaks Avenue  
4 South Pasadena, CA 91030  
5 Tel: (626) 799-9375  
6 Fax: (626) 799-9380  
7 e-mail: lac4justice@gmail.com

8 Attorneys for Claimants

9 **JESUS CASTILLO,**  
10 **MARTHA SAUCEDO,**  
11 **Minor JDC,**  
12 **ESTATE OF JESUS CASTILLO,**  
13 **Claimants**

**CLAIM FOR DAMAGES**

14 **COUNTY OF RIVERSIDE,**  
15 **SHERIFF STAN SNIFF,**  
16 **DEPUTY FRED MARTINEZ,**  
17 **DOES 1 through 20,**  
18 **Respondents.**

19 **TO THE CLERK OF THE COUNTY OF RIVERSIDE:**

20 **THE UNDERSIGNED HEREBY SUBMITS TO THE PRESENTLY**  
21 **IDENTIFIED PUBLIC ENTITY THE FOLLOWING WRITTEN CLAIM**  
22 **FOR MONEY DAMAGES:**

- 23 1. **NAME OF CLAIMANTS:**  
24 **JESUS CASTILLO, MARTHA SAUCEDO, Minor JDC,**  
25 **ESTATE OF JESUS CASTILLO**
- 26 2. **NAME AND POST OFFICE ADDRESS OF THE PERSON TO**  
27 **WHOM NOTICE ON THIS CLAIM IS TO BE SENT:**

Submitted by Juan Jara  
9/25/12 Item oral  
(date)

1                   **JESUS CASTILLO, MARTHA SAUCEDO, Minor JDC,**  
2                   **ESTATE OF JESUS CASTILLO Jr.**

3                   c/o LUIS A. CARRILLO, ESQ.  
4                   1525 Fair Oaks Avenue  
5                   South Pasadena, California 91030

6    3.    **DATE AND LOCATION WHERE INJURY SUSTAINED**  
7           Wrongful death of JESUS CASTILLO, July 1, 2012, RIVERSIDE  
8    COUNTY, County of Los Angeles, California.

9    4.    **GENERAL DESCRIPTION OF THE INJURY INCURRED:**

10           On July 1, 2012, Deputy Fred Martinez employed by the COUNTY of  
11    RIVERSIDE and SHERIFF STAN SNIFF, caused the death of JESUS CASTILLO,  
12    Jr. and thereby caused the injuries and damages to Claimants JESUS CASTILLO,  
13    MARTHA SAUCEDO, who are the parents of JESUS CASTILLO, to the Minor  
14    JDC, and the to the ESTATE OF JESUS CASTILLO Jr. Respondents RIVERSIDE  
15    COUNTY, SHERIFF STAN SNIFF, and DOES 1- 20, caused the injuries and  
16    damages complained herein below.

17           The incident occurred at a Moreno Valley park. Deputy Fred Martinez  
18    arrived at the park and confronted Jesus Castillo Jr. After the confrontation with  
19    Deputy Fred Martinez, Castillo slowly began walking away. Castillo was totally  
20    and completely unarmed. Castillo had his back to Deputy Martinez, at a distance  
21    of about 15 feet away from Deputy Martinez, when Deputy Martinez drew his  
22    pistol and fired three shots at Castillo. Castillo had his back to Deputy Martinez  
23    when Castillo was shot. Photos taken after the shooting confirm that two bullets  
24    entered Castillo's back.

25           The present wrongful death claims are made by the present claimants for the  
26    loss of love, affection, society, support and services of JESUS CASTILLO Jr.  
27    JESUS CASTILLO Jr. experienced severe pain and suffering and lost his life for  
28    which the is entitled to recover damages.

1 The shooting of JESUS CASTILLO was a result of the unconstitutional  
2 policies, practices and procedures in place at RIVERSIDE COUNTY Sheriff's  
3 Department regarding the use of firearms against unarmed persons. The COUNTY  
4 Of RIVERSIDE, and SHERIFF STAN SNIFF, ratify, condone, and acquiesce in the  
5 negligent and/or excessive use of force by Riverside County deputies; ratify,  
6 condone, and acquiesce, in the filing of false police reports to "cover up" the  
7 negligent and/or excessive use of force; and ratify, condone, and acquiesce, in the  
8 falsification of evidence, the "planting" of evidence to "cover up" the negligent  
9 and/or excessive use of force, and other police misconduct.

10 As a direct result of the death of JESUS CASTILLO Jr., the present  
11 Claimants have suffered the loss of the love, society, comfort, services, and support  
12 of JESUS CASTILLO Jr.

13 JESUS CASTILLO's successors-in-interest seek both wrongful death and  
14 survival damages under this claim. Further, as a direct result of the unreasonable  
15 and negligent use of deadly force which was used against JESUS CASTILLO Jr.,  
16 the present Claimant's Fourteenth Amendment substantive due process rights to be  
17 free from unwarranted state interference in Claimants' familial relationship with  
18 JESUS CASTILLO Jr. have been violated. JESUS CASTILLO Jr. experienced  
19 severe pain and suffering and lost his life for which the is entitled to recover  
20 damages.

21 **5. HOW INJURY OR DAMAGES OCCURRED/ BASIS FOR LIABILITY**

22 On July 1, 2012, the present Claimants JESUS CASTILLO, MARTHA  
23 SAUCEDO, were the parents of JESUS CASTILLO. The Minor JDC is the son of  
24 Decedent Jesus Castillo Jr.

25 The injuries suffered by the present Claimant resulted from the unreasonable  
26 and/or negligent use of deadly force against JESUS CASTILLO by RIVERSIDE  
27 COUNTY deputies, who used excessive and/or negligent deadly force against  
28 JESUS CASTILLO Jr.

1 Said deputies intentionally and/or negligently failed to take reasonable steps  
2 and measures to subdue or restrain JESUS CASTILLO Jr. into custody without any  
3 use of force.

4  
5 **6. OTHER PERTINENT INFORMATION:**

6 **Damages of Claimants:**

7 As a direct and proximate cause of the acts of RIVERSIDE COUNTY,  
8 SHERIFF STAN SNIFF, DEPUTY FRED MARTINEZ, and DOES 1 - 20, JESUS  
9 CASTILLO Jr. experienced severe pain and suffering and lost his life for which he  
10 is entitled to recover damages from the Respondents.

11 Claimants JESUS CASTILLO, MARTHA SAUCEDO, Minor JDC have also  
12 been deprived of the life-long comfort, support, society, care and sustenance of  
13 JESUS CASTILLO , and will continue to be so deprived for the remainder of their  
14 natural lives. Claimants JESUS CASTILLO AND MARTHA SAUCEDO are also  
15 claiming funeral and burial expenses and a loss of financial support.

16  
17 **7. OTHER CLAIMS AGAINST THE COUNTY OF RIVERSIDE:**

18 False Arrest, False Imprisonment, Battery, Negligence, Intentional Infliction  
19 and Emotional Distress, Negligent Infliction of Emotional Distress, State Civil  
20 Rights Violations, Violations of the Bane Act (Civil Code Section 52.1), Wrongful  
21 Death and Survival Actions. JESUS CASTILLO Jr.. experienced severe pain and  
22 suffering and lost his life for which he is entitled to recover damages.

23 To the extent that the conduct of said Deputies violated the civil rights of  
24 JESUS CASTILLO Jr., the COUNTY OF RIVERSIDE also violated the  
25 Substantive Due Process rights of the present Claimants to be free from state  
26 interference in a familial relationship with JESUS CASTILLO, in violation of the  
27 14<sup>th</sup> Amendment.

1 **8. TOTAL AMOUNT CLAIMED FOR PHYSICAL INJURIES, FUTURE**  
2 **MEDICAL CARE, LOST WAGES AND EARNING CAPACITY, AND**  
3 **PAST, PRESENT, AND FUTURE PHYSICAL AND**  
4 **PSYCHOLOGICAL, PAIN AND SUFFERING:**

5 The amount claimed exceeds the limit provided in section 910(f) of the  
6 Government Code. This will be an **unlimited damages** lawsuit.  
7

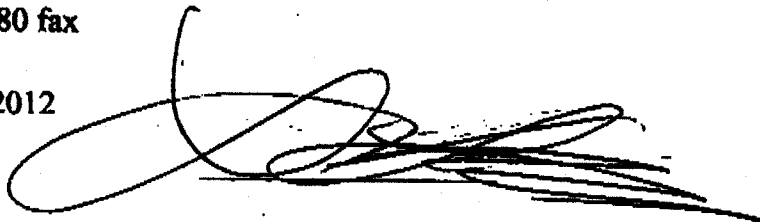
8 **9. NAME OF PRESENTLY KNOWN EMPLOYEES, AGENT, OR**  
9 **REPRESENTATIVES, WHOSE ACTS OR OMISSIONS CAUSED**  
10 **CLAIMANT'S INJURIES:**

11 Deputy Fred Martinez, various other unknown deputies, Sergeants,  
12 Lieutenants, Captains, Commanders, and civilian employees of the Riverside  
13 County Sheriff's Department.  
14

15 **10. ALL NOTICES OR OTHER COMMUNICATIONS REGARDING**  
16 **THIS CLAIMS SHOULD BE SENT TO CLAIMANTS AT:**

17 c/o Luis A. Carrillo, Esq.  
18 1525 Fair Oaks Avenue  
19 South Pasadena, California 91030  
20 (626)799-9375 tel  
21 (626) 799-9380 fax

22 Dated: September 24, 2012



23  
24 **LUIS A. CARRILLO**  
25 **On Behalf of Claimants**  
26  
27  
28

**Riverside County Board of Supervisors  
Request to Speak**

Submit request to Clerk of Board (right of podium),  
Speakers are entitled to three (3) minutes, subject  
Board Rules listed on the reverse side of this form.

**SPEAKER'S NAME:** JUAN JARA

**Address:** \_\_\_\_\_  
(only if follow-up mail response requested)

**City:** \_\_\_\_\_ **Zip:** \_\_\_\_\_

**Phone #:** \_\_\_\_\_

**Date:** 09-25-12 **Agenda #** ORAL

**PLEASE STATE YOUR POSITION BELOW:**

**Position on "Regular" (non-appealed) Agenda Item:**

\_\_\_\_\_ **Support**      \_\_\_\_\_ **Oppose**      \_\_\_\_\_ **Neutral**

**Note:** If you are here for an agenda item that is filed  
for "Appeal", please state separately your position on  
the appeal below:

\_\_\_\_\_ **Support**      \_\_\_\_\_ **Oppose**      \_\_\_\_\_ **Neutral**

**I give my 3 minutes to:** \_\_\_\_\_

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**Address:** \_\_\_\_\_  
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**City:** \_\_\_\_\_ **Zip:** \_\_\_\_\_

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