

1 John C. Taylor, State Bar No. 78389  
Neil K. Gehlawat, State Bar No. 289388  
2 **TAYLOR & RING, LLP**  
1230 Rosecrans Avenue, Suite 360  
3 Manhattan Beach, California 90266

4 Telephone: (310) 209-4100  
5 Facsimile: (310) 208-5052

6 Attorneys for Claimants  
7  
8

9 IN THE MATTER OF THE DIPUSTED CLAIMS OF:

10 LATOYA REINHOLD; S.R. and J.R.,  
11 minors by and through their guardian *ad*  
*litem*, Latoya Reinhold,

12 Claimants,

13 vs.

14 COUNTY OF ORANGE,

15 Defendants.  
16

) **CLAIM FOR WRONGFUL DEATH**

[Cal. Government Code section 910.4]

17  
18 TO THE CLERK OF THE BOARD OF SUPERVISORS:

19 This claim is being brought pursuant to California Government Code section 910.4 and all other  
20 pertinent code sections of the codes, statutes, and laws of the state of California.  
21

22 **A. The name and address of claimant:**

23 Latoya Reinhold and her minor children, S.R. and J.R. (wife and children of Kurt Reinhold)  
c/o:

24 John C. Taylor  
Neil K. Gehlawat  
25 TAYLOR & RING  
1230 Rosecrans Avenue, Suite 360  
26 Manhattan Beach, CA 90266  
27

28 ///

1           **B.     The post office address to which claimant wants all notices to be sent:**

2           John C. Taylor  
3           Neil K. Gehlawat  
4           TAYLOR & RING  
5           1230 Rosecrans Avenue, Suite 360  
6           Manhattan Beach, CA 90266

7           **C.     The date, place, and other circumstances giving rise to this claim are as follows:**

8           DATE:           September 23, 2020

9           PLACE:          2222 S El Camino Real, San Clemente, CA 92672 (in front of Hotel Miramar)

10          OTHER CIRCUMSTANCES:

11          INJURIES/DAMAGES:

- 12                           1. Wrongful Death Damages
- 13                           2. Survival Damages
- 14                           3. Statutory Damages
- 15                           4. Punitive Damages
- 16                           5. Attorney Fees

17          CLAIMS AGAINST:

18                           COUNTY OF ORANGE; ORANGE COUNTY SHERIFF'S  
19                           DEPARTMENT DEPUTIES (names currently unknown)

20          STATEMENT OF FACTS:

21                   On September 23, 2020, deputies with the Orange County Sheriff's Department shot and killed  
22                   Kurt Reinhold, an unarmed African-American man. The shooting occurred in broad daylight in front of  
23                   Hotel Miramar in San Clemente, California. At the time Mr. Reinhold was shot (twice), he was unarmed  
24                   and did not pose an imminent threat of death or serious bodily injury to either of the deputies.

25                   The two deputies, whose names are unknown to claimants at this time, are part of the department's  
26                   Homeless Outreach Team. Both deputies allegedly received training with respect to dealing with  
27                   homeless and mentally-ill individuals. This training includes de-escalation tactics; unfortunately, on this  
28                   date, the involved deputies *escalated* the situation with Mr. Reinhold. The specific reasons why the

1 deputies approached Mr. Reinhold in the first place remain unknown. Upon initial contact with Mr.  
2 Reinhold, one of the deputies already had his department-issued Taser in his hand. The deputies  
3 proceeded to “close space” on Mr. Reinhold and make physical contact with him, including tackling him  
4 to the ground. All of this was completely unnecessary given that Mr. Reinhold was unarmed and did not  
5 pose a threat to the deputies. Their use of deadly force was excessive and unreasonable.

6  
7 CONTENTIONS OF THE CLAIMANT:

- 8 1. Battery
- 9 2. Negligence
- 10 3. Violation of the Bane Act (California Civil Code section 52.1)
- 11 4. Negligent supervision, hiring, training, and/or retention
- 12 5. Violations of the California Constitution
- 13 6. Federal civil rights claims pursuant to 42 U.S.C. sections 1983, 1985, and 1988

14  
15 JURISDICTION:

16 Both the Superior Court of the State of California for the County of Orange and the United States  
17 District Court for the Central District of California have jurisdiction over an action filed with respect to  
18 this claim. The amount of the claim exceeds \$25,000 and therefore jurisdiction is designated as  
19 “unlimited.”

20 Dated: October 6, 2020

TAYLOR & RING

21  
22 By: 

23 John C. Taylor  
24 Neil K. Gehlawat  
25 Attorneys for Claimant  
26  
27  
28

1 PROOF OF SERVICE  
(Code of Civil Procedure §§ 1011, 1013, 1013a, 2015.5)

2 STATE OF CALIFORNIA )  
3 COUNTY OF LOS ANGELES ) ss.

4  
5 I, Analisa Alvarez, declare as follows:

6 I am employed in the County of Los Angeles, State of California. I am over the age of 18 and  
7 not a party to the within action or proceeding; my business address is 1230 Rosecrans Avenue, Suite 360,  
Manhattan Beach, California 90266; telephone (310) 209-4100.

8 On October 6, 2020, I served the foregoing document described as **CLAIM FOR WRONGFUL  
DEATH** on all interested parties in this action

9 [XX] By placing [XX] the original [ ] a true copy thereof enclosed in a sealed envelope  
10 addressed as follows:

11 Clerk of the Board of Supervisors  
12 333 W. Santa Ana Blvd., Suite 465  
Santa Ana, CA 92701

13 [ ] **BY MAIL** as indicated above.

14 [ ] As follows: I am "readily familiar" with the firm's practice of collection and processing  
15 correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on  
16 that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of  
business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation  
date or postage meter date is more than one day after date of deposit for mailing in affidavit.

17 [XX] **BY PERSONAL/HAND SERVICE** by causing a true copy of said document to be hand-  
18 delivered as indicated above via messenger.

19 Executed on October 6, 2020, at Manhattan Beach, California.

20 [XX] **(STATE)** I declare under penalty of perjury under the laws of the State of California that  
21 the foregoing is true and correct.

22   
23 Analisa Alvarez