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10 **ATTACHMENT TO TORT CLAIM BY**
11 **COMPLAINANT CHIEF LAJUANA HASELRIG**
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1 **STATEMENT OF FACTS**

2 1. On March 29, 2022, the County of Los Angeles’ Sheriff, ALEX VILLANUEVA
3 (“Villanueva”) ADMTTED THAT HIS ADMINISTRATION COMMITTED CRIMES
4 INCLUDING OBSTRUCTION OF JUSTICE by covering up an incident of excessive use of
5 force. The deputy in the incident used the same maneuver used by Derek Chauvin to murder
6 George Floyd, so it is quite remarkable that the head of the Los Angeles County Sheriff’s
7 Department (“LASD”) admitted that the County of Los Angeles is liable for such wrongdoing,
8 both the excessive force, and the criminal cover up. Inexplicably, Villanueva, as the head of this
9 administration, did not immediately resign after making this confession.
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11 2. Instead of resigning, Villanueva, desperate and panicked for a cover story, turned
12 around and illegally fabricated that the Complainant, CHIEF LAJUANA HASELRIG, along
13 with Assistant Sheriff Robin Limon were the ones in his administration who did the cover up
14 instead of him. In an effort to make the frame up of his staff look plausible, Villanueva forced
15 Complaint and Limon out. Villanueva ordered Complainant and Limon to pick between two
16 poisonous options by the end of the business day on March 29,2022: retire or be demoted. Limon
17 subsequently was demoted four ranks, to lieutenant. Complainant was forced retired. Villanueva
18 violated state ordinance and law by sending Undersheriff Murakami to Complainant’s home
19 while she was out on medical leave. Under the law, an employee shall not receive discipline,
20 removal of position or demotion while off work due to a job relate injury. But then following the
21 law is not Villanueva’s strong suit.

22 3. Up through the moment of filing this claim, Sheriff Villanueva continues with his
23 complete disregard for law and ethics, as he plots with his Undersheriff Timothy Murakami to
24 further frame his own employees, the whistleblowers, in a desperate effort to avoid scrutiny. In
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1 addition to trying to pressure Captain Angela Walton to write up a fictional timeline of events to
2 match his lies to the media, Villanueva also has opened a rigged Internal Affairs Bureau
3 investigation into Commander Jose Rios, with a fake allegation that Rios tampered with an
4 (another fake, rigged) investigation into the use of force incident. After the video and
5 Villanueva's cover up of the incident hit the media, Villanueva also promoted Anthony
6 Blanchard to Captain in an effort to buy his silence, and get him to commit the crime of perjury,
7 and support his fake story that he did not see the video on the excessive use of force in March
8 2021. It is unknown at this time if Blanchard will allow himself, and others around him, to be
9 pressured into lying under oath to protect Villanueva. Villanueva also promoted one Steven Ruiz
10 who hid an early draft of force package of the incident from Assistant Sheriff Limon, and tried to
11 procure her blank stationary, presumably to forge notes from her. The sheriff is now reportedly
12 frantically scheming to use Ruiz against Limon and release false statements to the media, in
13 unprecedented violations of state statute, Peace Officers Bill of Rights, as well as further
14 defamatory conduct against his own staff.

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16 4. Due to the Sheriff's illegal conduct, Complainant's long career in law
17 enforcement is over and illegally destroyed by the County of Los Angeles and its employees.

18 5. Villanueva retaliated against Complainant and Limon and other whistleblowers,
19 including Commander Allen Castellano, after they exposed Villanueva's cover up of the use of
20 excessive force by Deputy DOUGLAS JOHNSON against an inmate, ENZO ESCALANTE.

21 6. Deputy Johnson is the deputy who took photos of Kobe Bryant's remains after he
22 tragically died in a helicopter crash. Villanueva gave him no discipline for that act. Then, on
23 March 10, 2021, at San Fernando Courthouse, Deputy Johnson may have engaged in excessive
24 force against inmate Enzo Escalante. Escalante alleges that Johnson assaulted him and that this

1 prompted the inmate to strike Johnson and assault him. Deputy Johnson disputes that he shoved
2 Escalante. What is not in dispute is that after Johnson properly restrained Escalante, Johnson
3 then placed his knee on Escalante's head and restricted his breathing long after Escalante stopped
4 resisting the deputy. The incident is reminiscent of how officer Derek Chauvin had improperly
5 cut George Floyd's air off. Here, Escalante survived, but the nature of the deputy's conduct
6 called for a swift criminal and administrative investigation into his conduct. Remarkably,
7 Johnson was placed under criminal investigation for an unrelated incident, on March 9, 2021,
8 just one day prior to this UOF incident.

9 7. Whistleblower Allen Castellano, a Commander, was alerted of the Escalante
10 incident and he, his supervisor, LaJuana Haselrig, the Complainant, took all the necessary steps
11 to handle the matter promptly and properly. However, Sheriff Villanueva obstructed justice and
12 covered the UOF incident up and retaliated against the Complainant and others for blowing the
13 whistle on the illegal conduct. The sheriff once again used his usual political tactic of trying to
14 frame the whistleblowers for his own misconduct.

15 8. One of the reasons why Villanueva is maliciously targeting the Complainant is
16 because she has personal knowledge of Villanueva covering up the UOF incident. After asking
17 Assistant Sheriff Limon to view the video and show it to the Sheriff, Complainant gave the DVD
18 of the Use of Force ("UOF") incident to Limon on or about March 15, 2021. Limon told
19 Claimant she was heading immediately from there to Villanueva's office to show him the video.
20 That same day, Limon confirmed to Complainant that she watched the video with Villanueva
21 and that he agreed the force looked troubling and that he would "handle it," taking responsibility
22 for the investigation and the required referral to LASD's Internal Criminal Investigation Bureau
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1 (“ICIB”). Except what the Sheriff really meant by “handling it” was to cover it up, as he
2 acknowledged it would look “bad” for him if the video was shown to the media.

3 9. Villanueva has a long sordid history of regularly engaging in wrongful and
4 criminal conduct throughout his 3.5 years reign as Sheriff, and then retaliating against
5 whistleblowers like the Complainant when they report his misconduct. The County has done
6 nothing to hold Villanueva accountable and to protect its employee whistleblowers and its
7 residents from harm by Villanueva and LASD. Given there is no one holding him accountable,
8 Villanueva continues with his circus of corruption and deception. this incident, Villanueva has
9 been caught red-handed in his lies upon lies, and he has even admitted to confidants that he has
10 lied about his cover up.

11 10. We know Villanueva lied here for many reasons, including that he already
12 initiated and concluded an Internal Affairs Bureau (“IAB”) investigation into the delays in the
13 UOF being referred for a criminal investigation, and delays in the inmate’s assault case being
14 sent to the District Attorney. On March 6, 2022, the sheriff wrapped up the investigation with no
15 finding of wrongdoing by Complainant or Limon. Even though the investigation was rigged by
16 the sheriff, the only lie at that time he came up with was that Commander Allen Castellano made
17 a procedural mistake in the investigation that caused delays. Yet, less than 4 weeks later, he
18 suddenly pretended that Complainant and Limon did his cover up for him.

19 11. The reasons for the Sheriff’s misconduct were twofold, to retaliate against the
20 Complainant for being a whistleblower on several instances of illegal and other wrongful
21 conduct, including with this UOF, and to further his cover up of an excessive use of force
22 incident.
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1 12. Another reason why Villanueva is targeting Complainant is there has been a
2 history of the Complainant reporting and raising concerns about wrongful conduct, including
3 Villanueva’s habit of retaliating against people with differing opinions and whistleblowers.
4 Assistant Sheriff Robin Limon documented in a claim she recently filed a dizzying amount of
5 incidents where Villanueva abused government power by promoting unqualified people to
6 Captain positions even when there were findings against them of serious wrongdoing, and in
7 retaliating against whistleblowers. Limon also documented thefts of government monies where
8 employees are paid by the County but don’t work for the County, instead working on behalf of
9 Villanueva’s re-election campaign. Likewise, Complainant has reported and called out the sheriff
10 for retaliation against whistleblowers and other wrongful conduct.

11 13. In addition, the Sheriff has targeted Complainant for being African American.
12 The Sheriff has a history of making racist statements in private.

13 14. Villanueva has made it clear in public statements that he has racial resentments,
14 engaging in generalizations and false statements about African Americans, and blames African
15 Americans for supposedly holding him back in his career. On March 24, 2022, in a media
16 interview, Villanueva claimed that the “overwhelming majority” of those assaulting Asian
17 victims of hate crimes are “black.” This is false. Villanueva also seeks to pit Latinos against
18 African Americans as if there is a racial contest. In the same infamous interview, Villanueva
19 complained of looking at a wall of photos of division chiefs and said, “I counted nine Black
20 division chiefs... and I thought to myself, ‘Nine [“blacks] and one [Latinos].’” In the same
21 interview, Villanueva complained there were too many black writers at the Los Angeles Times,
22 saying “for every Black reporter, you expect to see four Latino.”
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1 15. Inside LASD, Villanueva is likewise known for racism and bias towards African
2 Americans, calling an African American “knuckle dragger,” and refusing to discipline his
3 Undersheriff Timothy Murakami for calling employees the Japanese language version of the “n”
4 word.

5 16. When Complainant expressed to Villanueva that she hoped there would be
6 fairness and opportunity for qualified African Americans to promote in the department,
7 Villanueva dismissively told her that “we have enough of you,” meaning enough African
8 Americans in management, indicating a bias against African Americans seeking earned
9 promotions. Complainant has observed that Sheriff Villanueva does not like African American
10 people.

11 17. Complainant holds a Master’s Degree (Emergency Management Administration),
12 and has a long successful 34 year history working for LASD, 3 years on the line in custody, 5
13 years on the line in patrol (Carson Station) as a deputy, 3 years at training bureau, 4.5 years on
14 the line (Compton Station) as a sergeant, 1.3 years on the line in custody as a lieutenant, 5.5
15 years on the line (West Hollywood Station) as a lieutenant, 2 years at Coveted Testing, 1 year at
16 Crime Stoppers, 2.8 years at Central Property and Evidence as a lieutenant, and service as
17 Captain over Court Services Division, Transportation Bureau. Complainant has served as Chief
18 of Court Services Division for 3 years, since March 2019, until she was wrongfully terminated
19 by the Sheriff on March 29, 2022.

20 18. Early in 2019, Complainant witnessed the Sheriff deny the opportunity for a
21 qualified Lieutenant, initials “TS” an opportunity to interview for an open captain position,
22 because she was African American, and out of retaliation. Complainant objected to the illegal
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1 denial of opportunity and reminded the sheriff that the lieutenant met his new prerequisites to
2 interview.

3 19. On another occasion, Complainant informed the sheriff that LASD is required
4 under the law to give both female and males an opportunity to interview for captain or other
5 positions if they are qualified regardless of race. But Villanueva stated that there were “enough
6 whites promoted.” After reporting on the sheriff’s illegal conduct, Complainant was no longer
7 allowed to attend the sheriff’s administration meetings.

8 20. Villanueva transferred another lieutenant, initials J.L., apparently because he is
9 African American. J.L. was hired as Undersheriff Timothy Murakami’s aide. However, after J.L.
10 was on the job as the aide for just two days, the sheriff walked into the undersheriff’s office,
11 looked at J.L., and had him removed from the position. Complainant informed Villanueva that
12 J.L. was perfectly qualified for the position and there was no legal basis for removing him as the
13 aide. The sheriff ignored the notice by Complainant.

14 21. Early on in his reign as sheriff, Villanueva let it be known that he had issues with
15 Court Services Division and wanted to break laws and rules. The sheriff told Complainant to
16 break up the Special Operations Unit (SOU). Villanueva argued that the SOU members do not
17 work for the judges or Board of Supervisors (“BOS”), they work for the Sheriff’s Department
18 and can be reassigned. The sheriff was trying to remove most of the SOU team. Complainant
19 pushed back, telling Villanueva that the BOS pays for a portion of the team and LASD can’t
20 remove personnel based on his feelings against the BOS. Commanders Allen Castellano and
21 Dan Dyer and Complainant discussed the major problems this would cause the department if
22 they dismantled the SOU unit. Complainant refused to dismantle the unit.
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1 22. During several executive staff meetings, (chiefs and above attend weekly
2 meetings), the sheriff would use profanity to discuss how much animosity he had toward the
3 BOS. Villanueva threatened on several occasions to “get” whistleblowers for sharing information
4 about his wrongful conduct. Complainant reported to the sheriff that it is illegal to retaliate
5 against whistleblowers and argued for him to stop such conduct.

6 23. After Villanueva stated he was looking for revenge on whistleblowers in a
7 teleconference meeting, stating again he would “get” a whistleblower, Complainant texted him to
8 stand down, telling him ‘you can’t say that,’ and to “stop.” Complainant then went to
9 Villanueva’s office and repeated that he can’t legally say those things and retaliate against
10 whistleblowers. Villanueva replied, “but I’m the elect.” Complainant told him that he was
11 opening the department up to liability with his threats and retaliation. The Sheriff did not listen
12 to her warnings and eventually Complainant would become subject to retaliation herself.

13 24. Regarding the UOF incident, Complainant at all times did everything right and
14 made sure to report the wrongdoing of the sheriff after he blocked the investigation into the
15 deputy to hide the video and incident from the public. Complainant was informed of the UOF by
16 Deputy Johnson on the day of the incident and watched the video and was troubled by the
17 similarities to the Derek Chauvin/George Floyd incident. As supervisor to Commander
18 Castellano, Complainant made sure to stay in the loop and to review and guide Castellano to take
19 all necessary steps to get the matter to ICIB for criminal investigation. Castellano informed
20 Complainant on March 10, 2021, Captain Robert Jones was told to consult with ICIB to see if a
21 criminal investigation was warranted. The consult should have happened right away. Jones and
22 his successor in West Bureau, Captain Sanchez, were responsible for making the referral for the
23 consult. The consult did not happen because Villanueva blocked it and covered it up.
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1 25. Commander Castellano diligently spoke with Captains Jones and Sanchez and
2 instructed both to consult with ICIB. Prior to Captain Sanchez being transferred, Commander
3 Castellano stated the case was not presented to the DA's office for filing consideration and that
4 he had to instruct Sanchez to have the case submitted. She was later transferred out and Captain
5 Walton assumed command of West Bureau. It was then that Complainant and Castellano learned
6 that ICIB was still not consulted and that IAB was trying to complete its investigation. It is now
7 clear that Villanueva instructed West Bureau not to proceed.

8 26. Complainant grew increasingly concerned about Villanueva's conduct.
9 Complainant had witnessed the Sheriff on multiple occasions engage in improper and even
10 illegal conduct. Complainant believed that if the Sheriff was delaying the criminal investigation,
11 he was putting residents' lives at risk. The UOF by Johnson should have been investigated
12 completely and if Deputy Johnson engaged in wrongful conduct, he needed to be held
13 accountable. If this potential method of use of force was being used by other deputies, the Sheriff
14 needed to train them and make sure the practice was stopped. The Sheriff has tried to make light
15 of the incident, stating that the inmate did not die. However, after Derek Chauvin murdered
16 George Floyd, law enforcement agencies were enlightened about this particular type of use of
17 force used by Chauvin and Johnson. What had been an accepted practice in some agencies in the
18 past was no longer seen as appropriate. Law enforcement agencies now recognized that this
19 tactic could prove to be lethal. Villanueva should have acted on this excessive UOF immediately
20 when Limon showed him the video and protected the County's residents.

21 27. Complainant thought that had Villanueva acted promptly and properly on this
22 troubling video of what appeared to be an excessive use of force, the Sheriff could have
23 prevented future excessive uses of force by deputies. In March 2021, Villanueva should have
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1 issued a warning and reminder to deputies within the department to not use excessive force. In
2 April 2021, another troubling use of force occurred, this time against a disabled resident.

3 28. On June 16, 2021, Complainant shared Castellano’s concerns with Limon about
4 Captain Sanchez refusing to have the case against inmate Enzo Escalante submitted to the
5 District Attorney’s Office for prosecution. Sanchez has admitted that she did not send the case to
6 the district attorney, despite the video being such strong and obvious evidence of the inmate
7 committing assault against the deputy and acknowledging the similarities to Derek Chauvin and
8 George Floyd incident. Sanchez said it would “open a pandora’s box” to send the Inmate’s case
9 to the DA. What Sanchez and Villanueva meant by “pandora’s box” is that the video would
10 have made it out to the public, and exposed Villanueva’s cover up of excessive force.

11 29. Under Complainant’s supervision and with her review and approval, Castellano at
12 all times followed proper procedures in this matter. Castellano sent the UOF packet back for
13 corrections to West Bureau, April 27, 2021, May 4, 2021, June 2, 2021, June 23, 2021, and
14 approved force review on July 13, 2021, only for the efforts of himself, and Complainant to be
15 stymied by Villanueva.

16 30. By July 2021, Castellano and Complainant knew it was time to blow the whistle
17 on obstruction of the investigation. Subsequently, in his final UOF package written in July 2021,
18 Castellano created a paper trail of the cover up. In his final report, Castellano noted the
19 irregularities and possible crimes being committed by LASD personnel and supported an
20 investigation into the incident. Castellano hoped his report would alert and jump start a proper
21 handling of the Escalante use of force matter. Complainant shared the same hope that their
22 blowing the whistle would prompt everything to be righted and be put on proper track, and she
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1 reviewed the July 2021 package and signed off on it. However, Castellano’s report did not
2 generate the response they hoped, as Villanueva continued to quash the investigation.

3 31. Villanueva regularly uses a certain political tactic against whistleblowers like he
4 did with the Complainant. When the whistle is blown, he immediately denies the allegations and
5 moves to cover up the misconduct. In addition, Villanueva “flips the script” on the
6 whistleblowers and accuses them of the exact wrongdoing they are reporting on. Villanueva then
7 initiates rigged Internal Affairs Bureau (“IAB”) investigations against the whistleblowers and/or
8 announces he has a launched a (fake) criminal investigation into them and denies earned
9 promotions and gives unfair demotions to the whistleblowers. This is what happened with the
10 UOF incident here.

11 32. The County’s own Inspector General has made the party admission on behalf of the
12 County that Sheriff Alex Villanueva and County employee Deputy Douglas Johnson may have
13 committed the following violations and/or crimes: 1) The First Amendment of the United States
14 Constitution (*See, e.g. Garcetti v. Ceballos*, 547 U.S. 410 (2006) (While a public employer can
15 regulate on-duty speech, the 1st Amendment protects some public speech by employees about
16 their employment including the public reporting of misconduct); The Fourth and Fourteenth
17 Amendments of the United States Constitution protect against police seeking charges without
18 probable cause. (*See, e.g., Thompson v. Clark*, 596 U.S. (2022); The Fourth, Eighth, and
19 Fourteenth Amendments to the United States Constitution prohibiting the use of excessive force;
20 California Labor Code section 1102.5 prohibiting an employer from retaliating against
21 employees who report potential violations of law to a governmental agency; California Penal
22 Code section 13670 prohibiting law enforcement gangs, including groups of peace officers who
23 engage in a pattern of on duty illegal behavior or behavior which violates fundamental principles
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1 of professional policing, and provides for inspector general investigation; California Penal Code
2 section 13510.8, which provides for decertification of a peace officer who participates in a law
3 enforcement gang or fails to cooperate with an investigation of potential police misconduct after
4 January 1, 2022; California Penal Code section 518, which prohibits threatening a public official
5 to influence official duties. In addition to those possible crimes and violations, Complainant
6 alleges upon information and belief that Sheriff Villanueva committed other possible crimes and
7 violations including obstruction of justice. Villanueva also violated laws against racial
8 discrimination.

9 33. In addition to racial discrimination, Complainant was retaliated against by
10 Villanueva for Complainant reporting Villanueva's misconduct and for pushing for LASD and
11 the Sheriff to do the right thing. The County is liable for Complainant's harms under the
12 whistleblower statutes, and has done nothing to protect its employees from Villanueva and
13 LASD's retaliation against them. Villanueva and LASD also violated Complainant's civil rights,
14 rights under FEHA, and due process rights under the Peace Officers' Bill of Rights (POBR).

15 34. Complainant will sue the Sheriff separately for defamation. As part of his cover up,
16 the Sheriff maliciously lied and framed Complainant and put her in a false light, to make it look
17 like she, along with Assistant Sheriff Limon, did the cover up instead of the Sheriff. The Sheriff
18 is personally liable for defamation. The malicious frame up, and illegal termination have caused
19 extreme distress in Complainant, who suffers chest pains and is unable to sleep. Villanueva
20 cynically destroyed Complainant's career and reputation, and severely damaged her life.

21 35. The Complainant calls on the Sheriff to immediately cease and desist in making
22 knowingly false statements about the Complainant.
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May 4, 2022

THE LAW OFFICES OF VINCENT MILLER

Vincent Miller

VINCENT MILLER, Attorney for Complainant