

County of Santa Cruz⁰⁰³⁵

OFFICE OF THE COUNTY COUNSEL

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GOVERNMENT TORT CLAIM

RECOMMENDED ACTION

Agenda September 28, 1999

To: Board of Supervisors

Re: Claim of Mark Mendez, Rhonda Mastropaolo and Alexia Mastropaolo, No. 899-153(B)

Original document and associated materials are on file at the Clerk to the Board of Supervisors.

In regard to the ~~above-referenced~~ claim, this is to recommend that the Board take the following action:

- X 1. Deny the claim of Mark Mendez, Rhonda Mastropaolo and Alexia Mastropaolo, No. 899-153(B) and refer to County Counsel.
2. Deny the application to file a late claim on behalf of _____ and refer to County Counsel.
3. Grant the application to file a late claim on behalf of _____ and refer to County Counsel.
4. Approve the claim of _____ in the amount of _____ and reject the balance, if any, and refer to County Counsel.
5. Reject the claim of _____ as insufficiently filed and refer to County Counsel.

cc: Cecilia Espinola, Administrator
Human Resources Agency

RISK MANAGEMENT

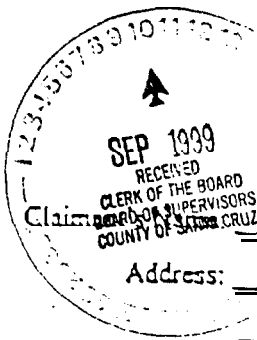
By Janet McKinley

COUNTY COUNSEL

By Samuel Torres, Jr.

CLAIM AGAINST THE COUNTY OF SANTA CRUZ
(Pursuant to Section 910 et Seq., Govt. Code)

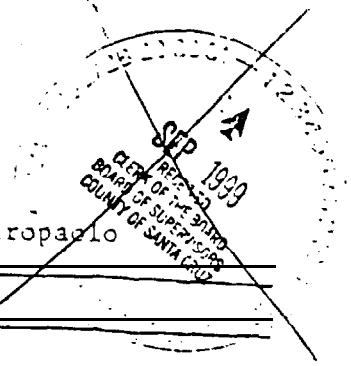
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TO: BOARD OF SUPERVISORS
COUNTY OF SANTA CRUZ

ATM: Clerk of the Board
Governmental Center

701 Ocean Street, Santa Cruz, CA 95060



1. Claimant: Mark Mendez, Rhonda Mastropaolo, and Alexia Mastropaolo

Address: 1200 Capitola Road #11

Santa Cruz, CA 95062

Phone No: (831) 477-9424

P.O. Box to which notices are to be sent: N/A

2. Occurrence: Civil rights violations to include knowing or reckless false representations for purpose of depriving natural parents or their child care, comfort, guidance of
Date: June 7, 1999 Place: 1200 Capitola Road, Santa Cruz its parents

Circumstances of occurrence or transaction giving rise to claim: Agents of Santa Cruz County including CP worker Rachel Hart and SCSO Deputy McConnell conspires with one another and intentionally or recklessly presented a claim to a judicial officer that Alexia Mastropaolo had been born a month before heroin addiction received dopamine injections at that time, and the biological mother, claimant Rhonda Mastropaolo, was "somewhat disoriented"

4. implying ingestion of drugs which caused her to be an unfit mother who endangered the General description of indebtedness, obligation, injury, damage or loss incurred so far as is now known: life of her newborn.

Plaintiffs have suffered irreparable injury to their well being including detrimental interference with the bonding of parent and child. Claimant Mark Mendez was cited for contempt by another judicial officer after his disclosure.

5. Name(s) of public employee(s) causing injury, damage or loss, if known: Rachel Hart, SCSO Deputy McConnell and others, presently unknown.

6. Amount claimed now \$ 1 million

Estimated amount of future loss, if known \$ unknown

TOTAL \$ Excess of 1 million

7. Basis for above computations: _____

8. If the amount claimed is over \$10,000, indicate the court of jurisdiction:

_____ Municipal Court _____ Santa Cruz County _____ Superior Court

CLAIMANT'S SIGNATURE

Note: Claim must be presented to Clerk, Board of Supervisors, within six (6) months after the act which occasioned the injury.

Americans with Disabilities Act questions or requests for accommodations may be directed to the ADA Coordinator at 454-2962 (TDD 454-2123)