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Attorneys for Plaintiffs, VICTORIA HAYES and LIZBETH MARTINEZ

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9  
10 **FOR THE COUNTY OF SAN DIEGO – CENTRAL DIVISION**

11  
12 VICTORIA HAYES, individually and as  
13 Successor in Interest to Malikai Elias Orozco-  
14 Romero and Mason Manuel Orozco-Romero;  
15 LIZBETH MARTINEZ, an individual,

16 Plaintiffs,

17 vs.

18 CITY OF SAN DIEGO a California City;  
19 ANGEL VELASQUEZ SALGADO, an  
20 individual; and DOES 1 through 50, inclusive

21 Defendants.

Case No: 24CU026085C

**PLAINTIFFS’ CIVIL COMPLAINT FOR DAMAGES**

1. Negligence
2. Negligence Pursuant to Cal. Civil Code § 1714, Gov. Code §§ 815.2(a), 820(a), Cal. Veh. Code §§ 17001, 17002, 17150, 21056
3. Breach of Mandatory Duties

**DEMAND FOR JURY TRIAL**

*“Amount in controversy exceeds the jurisdictional minimum for this court”*

22  
23  
24 COME NOW Plaintiffs, VICTORIA HAYES, individually and as Successor in Interest to  
25 MALIKAI ELIAS OROZCO-ROMERO and MASON MANUEL OROZCO-ROMERO; and  
26 LIZBETH MARTINEZ, (collectively, “PLAINTIFFS”), and hereby respectfully allege as follows:

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1 **GENERAL ALLEGATIONS**

2 1. On December 8, 2023, Defendant CITY OF SAN DIEGO’s San Diego Police Department,  
3 by and through its officers, agents, employees, servants, and independent contractors, negligently  
4 initiated and continued a pursuit of Defendant ANGEL VELASQUEZ SALGADO. Upon information  
5 and belief, the pursuit was initiated based upon SALGADO’s failure to stop in response to a routine  
6 traffic stop. The pursuit of SALGADO continued for several miles, reaching excessively high speeds,  
7 entering the highway, and ultimately culminating at the 805 S offramp at or around 43rd Street. As a  
8 result of the high-speed police chase, SALGADO struck a Honda SUV and the pursuit continued.  
9 Thereafter, as a result of the high-speed police chase, SALGADO collided with the vehicle that  
10 PLAINTIFFS and 8-year-old MALIKAI ELIAS OROZCO-ROMERO and 4-year-old MASON  
11 MANUEL OROZCO-ROMERO were traveling in at a high speed. As a result, PLAINTIFFS’ vehicle  
12 was sent off the offramp, into a tree, and burst into flames. The collision caused the deaths of MALIKAI  
13 ELIAS OROZCO-ROMERO and MASON MANUEL OROZCO-ROMERO and serious personal  
14 injuries to Plaintiffs VICTORIA HAYES and LIZBETH MARTINEZ. (The “Subject Incident.”)

15 2. Plaintiff VICTORIA HAYES is, and all times herein was, an individual residing in the  
16 City of San Diego, County of San Diego, State of California. Plaintiff VICTORIA HAYES is the  
17 surviving biological mother of decedents MALIKAI ELIAS OROZCO-ROMERO and MASON  
18 MANUEL OROZCO-ROMERO. Plaintiff VICTORIA HAYES is a successor-in-interest and heir at law  
19 of decedents MALIKAI ELIAS OROZCO-ROMERO and MASON MANUEL OROZCO-ROMERO  
20 pursuant to California Code of Civil Procedure sections 377.60 and 377.30. Plaintiff VICTORIA HAYES  
21 brings this action as the surviving heir of decedents MALIKAI ELIAS OROZCO-ROMERO and  
22 MASON MANUEL OROZCO-ROMERO for their wrongful deaths that occurred on December 8, 2023.

23 3. The biological father of decedents MALIKAI ELIAS OROZCO-ROMERO and MASON  
24 MANUEL OROZCO-ROMERO died prior to December 8, 2023. Plaintiff VICTORIA HAYES is the  
25 only wrongful death heir of decedents MALIKAI ELIAS OROZCO-ROMERO and MASON MANUEL  
26 OROZCO-ROMERO.

27 4. At the time of and prior to their deaths, decedents MALIKAI ELIAS OROZCO-  
28 ROMERO and MASON MANUEL OROZCO-ROMERO were residents of the City of San Diego, State

1 of California. Despite their deaths, the legal claims belonging to MALIKAI ELIAS OROZCO-ROMERO  
2 and MASON MANUEL OROZCO-ROMERO have been approved to survive and be continued pursuant  
3 to California law. Plaintiff VICTORIA HAYES has rightfully brought and is pursuing this action as  
4 Decedents' successor-in-interest, as authorized by California law (including, but not limited to, Code of  
5 Civil Procedure sections 377.20, 377.30, 337.32, 377.34.) Plaintiff VICTORIA HAYES's successor-in-  
6 interest declaration, as required by Code of Civil Procedure section 377.32 is attached to this Complaint  
7 as **Exhibit 1**.

8           5.       Plaintiff LIZBETH MARTINEZ is, and all times herein was, an individual residing in the  
9 City of San Diego, County of San Diego, State of California.

10           6.       Plaintiffs VICTORIA HAYES, individually and as successor-in-interest to MALIKAI  
11 ELIAS OROZCO-ROMERO and MASON MANUEL OROZCO-ROMERO, and LIZBETH  
12 MARTINEZ, are referred to herein collectively as "PLAINTIFFS."

13           7.       PLAINTIFFS are informed and believe and thereon allege that at the time of the Subject  
14 Incident, Defendant ANGEL VELASQUEZ SALGADO ("SALGADO") was an individual residing in  
15 the City of San Diego, County of San Diego, State of California.

16           8.       PLAINTIFFS are informed and believe and thereon allege that all times mentioned herein  
17 the SAN DIEGO POLICE DEPARTMENT was and is a division/department of the Defendant CITY OF  
18 SAN DIEGO.

19           9.       PLAINTIFFS are informed and believe and thereon allege that all times mentioned herein,  
20 Defendant CITY OF SAN DIEGO ("CITY") was and is a municipal corporation, duly organized and  
21 existing under the laws of the State of California and situated in the State of California.

22           10.      PLAINTIFFS are informed and believe and thereon allege that at all times mentioned  
23 herein, Officer JACKSON CARROLL was and is an individual residing in the City of San Diego, County  
24 of San Diego, State of California.

25           11.      PLAINTIFFS are informed and believe and thereon allege that at all times mentioned  
26 herein, Officer JACKSON CARROLL was and is an employee and/or agent of Defendant CITY in the  
27 SAN DIEGO POLICE DEPARTMENT and was acting within the course and scope of his employment  
28 and/or agency.

1           12.     The true names and capacities, whether individual, corporate, associate, or otherwise of  
2 Defendants DOES 1 through 50, inclusive, are unknown to PLAINTIFFS who therefore sue said  
3 defendants by such fictitious names. PLAINTIFFS are informed and believe and thereon allege that each  
4 of the defendants herein designated as a DOE is responsible in some manner for the events and  
5 happenings herein referred to and caused injuries and damages proximately thereby as hereinafter  
6 alleged.

7           13.     PLAINTIFFS are informed and believe that each of the defendants is responsible in some  
8 manner, either by act or omission, strict liability, fraud, negligence, breach of contract, breach of  
9 express/implied warranty, negligence per se, or otherwise, for the occurrences alleged herein, and that  
10 Plaintiffs' damages were legally caused by the conduct of the defendants.

11           14.     PLAINTIFFS are informed and believe and thereon allege that at all times mentioned  
12 herein, each of the defendants was the agent, servant, and employee of the remaining defendants, and at  
13 all times mentioned herein, each was acting within the time, place, and scope of said agency and  
14 employment.

15           15.     PLAINTIFFS timely filed claims against the CITY on June 3, 2024. By the time of filing  
16 this Complaint, Plaintiffs' government claims have been rejected and/or may be deemed to have been  
17 rejected. Consequently, PLAINTIFFS have standing to bring suit for monetary damages against CITY.

18           16.     Venue is proper in this jurisdiction in that the acts giving rise to this lawsuit occurred  
19 within this court's jurisdictional area. Further, the relief sought through this Civil Complaint is within the  
20 jurisdiction of this court as such damages are believed to be well in excess of \$25,000.00.

21           17.     At the time of the Subject Incident, defendant ANGEL VELASQUEZ SALGADO was  
22 being pursued by a CITY SDPD vehicle being driven by Officer JACKSON CARROLL in the course  
23 and scope of his employment with Defendant CITY.

24           18.     Throughout the entire pursuit, Defendants' acts imperiled members of the public,  
25 including PLAINTIFFS and Decedents, placing citizens at great risk of serious injury or death. Because  
26 Defendants knowingly disregarded such risks, PLAINTIFFS' harm and Decedents' deaths were  
27 reasonably foreseeable.

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1           19. Defendants' pursuit caused defendant ANGEL VELASQUEZ SALGADO to drive faster  
2 and more dangerously than he otherwise would have.

3           20. Defendant CITY, Officer JACKSON CARROLL, and DOES 26-50 never should have  
4 engaged defendant ANGEL VELASQUEZ SALGADO in a high-speed chase and negligently failed to  
5 terminate the pursuit prior to causing harm and death to the public.

6           21. Upon information and belief, Defendant CITY, Officer JACKSON CARROLL, and  
7 DOES 26-50 did not have good cause to initiate a high-speed pursuit of defendant ANGEL  
8 VELASQUEZ SALGADO.

9           22. Further, given the risks to the public, Defendant CITY, Officer JACKSON CARROLL,  
10 and DOES 26-50 should not have continued the high-speed chase.

11           23. Upon information and belief, Defendant CITY, Officer JACKSON CARROLL, and  
12 DOES 26-50's pursuit of Defendant SALGADO was in violation of the law, their mandatory duties, the  
13 California Vehicle Code, SDPD Policies and Procedures, and State of California policies and procedures.

14           24. Upon information and belief, CITY failed to have a proper pursuit policy in place and/or  
15 failed to properly train its officers and agents as to the policy and/or failed to obtain certification of such  
16 training, review, or understanding of such policy. Additionally, any policy of the CITY and/or SDPD  
17 concerning pursuits failed to meet the required minimum standards.

18           25. The initiation of the pursuit of SALGADO was unnecessary and in violation of the law  
19 and/or SDPD policies and procedures. SDPD initiated pursuit prior to a showing that SALGADO failed  
20 to yield to a police vehicle operating with emergency lights and siren activated. Further, SDPD, by and  
21 through its officers and agents, did not have probable cause SALGADO committed an infraction or  
22 misdemeanor in their presence or that a felony had been or was being committed. SDPD made an  
23 incorrect assumption that simply by virtue of his fleeing, SALGADO was a serious criminal suspect. At  
24 the time of initiating and/or while continuing the pursuit, there was no need to protect the public from  
25 SALGADO nor any apparent need to immediately capture him.

26           26. Further, CITY and SDPD failed to properly assess the pedestrian and vehicular traffic  
27 patterns and volume, time of day, speed, capabilities and conditions of the involved vehicles, quality of  
28 radio communication, safety of occupants of the involved vehicles, weather and visibility, road

1 conditions, capabilities and condition of the involved personnel, and ability to apprehend the suspect at  
2 a later time. CITY and SDPD initiated and continued the pursuit of SALGADO through heavily  
3 populated and high traffic areas where a significant risk of injury or death to bystanders was readily  
4 apparent. More than two units were involved in the pursuit and the pursuing units failed to properly  
5 utilize the required lights and sirens and warnings to other drivers on the roadway.

6 27. Additionally, CITY and SDPD had the obligation to cease pursuit when the benefits of  
7 immediate apprehension are outweighed by the hazards of continuing the pursuit. CITY and SDPD  
8 failed to properly balance the seriousness of SALGADO's suspected crime or violation against the  
9 inherent risks of engaging in pursuit, including the foreseeable deaths and injury of PLAINTIFFS herein  
10 and potential for damage to personal or CITY property. As a result, CITY and SDPD failed to terminate  
11 the pursuit—even though doing so was in the best interest of public safety.

12 28. CITY and SDPD failed to follow the required communications procedures and  
13 responsibilities to conduct a pursuit. The pursuing officer failed to state the required information  
14 concerning the pursuit on the radio as required under CITY and SDPD policy.

15 29. CITY and SDPD should have terminated the pursuit and allowed CHP to take over once  
16 the pursuit ended up on the highway. CITY and SDPD failed to abandon the pursuit and allow CHP to  
17 take over.

18 30. During the pursuit, CITY and SDPD officers: failed to drive with due regard for the safety  
19 of all persons on the highway; failed to utilize safe driving habits and to drive in a reasonable manner;  
20 failed to recognize the dangers involved in driving a law enforcement vehicles; failed to drive at a speed  
21 that is safe for existing conditions; failed to yield the right of way when necessary; failed to make good  
22 choices while driving; and violated the due care test.

23 **FIRST CAUSE OF ACTION**

24 **(Negligence Against Defendant Angel Velasquez Salgado and Does 1 through 25)**

25 31. PLAINTIFFS hereby re-allege and incorporate by reference each and every preceding  
26 paragraph as though fully set forth herein.

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1           32. Defendant ANGEL VELASQUEZ SALGADO and DOES 1-10 owed PLAINTIFFS a  
2 duty of care to operate his vehicle in a safe and reasonable manner, and in compliance with the applicable  
3 statutes, codes, ordinances and laws.

4           33. Defendant ANGEL VELASQUEZ SALGADO and DOES 1-10 breached this duty by  
5 negligently and recklessly operating his vehicle in violation of due care, the vehicle code, and the law  
6 and striking and injuring Plaintiffs HAYES and MARTINEZ and killing decedents MALIKAI ELIAS  
7 OROZCO-ROMERO and MASON MANUEL OROZCO-ROMERO.

8           34. Defendants DOES 11-25 owed a duty of reasonable care to PLAINTIFFS. Defendants  
9 DOES 11-25 breached their duty of care by acting in a negligent manner which caused or contributed to  
10 harm to PLAINTIFFS.

11           35. Defendant ANGEL VELASQUEZ SALGADO and DOES 1-25's negligence caused  
12 and/or was a substantial factor in causing the Subject Incident and PLAINTIFFS' damages. These  
13 defendants' negligence caused and/or was a substantial factor in causing the Subject Incident, MALIKAI  
14 ELIAS OROZCO-ROMERO and MASON MANUEL OROZCO-ROMERO's deaths, and  
15 PLAINTIFFS' harms.

16           36. Plaintiff VICTORIA HAYES was present at the scene and witnessed the entire incident  
17 and perceived the deaths of her two sons, MALIKAI ELIAS OROZCO-ROMERO and MASON  
18 MANUEL OROZCO-ROMERO.

19           37. As a direct and proximate result of Defendants ANGEL VELASQUEZ SALGADO and  
20 DOES 1-25's negligence, Plaintiffs HAYES and MARTINEZ were harmed, decedents MALIKAI  
21 ELIAS OROZCO-ROMERO and MASON MANUEL OROZCO-ROMERO were killed, and Plaintiff  
22 VICTORIA HAYES has suffered the wrongful death of MALIKAI and MASON.

23           38. As a direct result of Defendants' negligence which caused injury and death to her sons,  
24 Plaintiff VICTORIA HAYES suffered serious emotional distress, including suffering, anguish, fright,  
25 horror, nervousness, grief, anxiety, worry, shock, humiliation, and shame.

26           39. As a further proximate result of Defendants' negligence, decedents MALIKAI ELIAS  
27 OROZCO-ROMERO and MASON MANUEL OROZCO-ROMERO suffered special damages, prior to  
28 their deaths, including medical expenses.

1 40. As a further proximate result of Defendants’ negligence, decedents MALIKAI ELIAS  
2 OROZCO-ROMERO and MASON MANUEL OROZCO-ROMERO suffered pain, suffering, and  
3 disfigurement prior to their deaths.

4 41. As a further proximate result of Defendants ANGEL VELASQUEZ SALGADO and  
5 DOES 1-25’s negligence, Plaintiffs HAYES and MARTINEZ suffered, and continue to suffer general  
6 damages, special damages, and all other damages allowable by law.

7 **SECOND CAUSE OF ACTION**

8 *(Negligence Pursuant to Cal. Civil Code § 1714, Gov. Code §§ 815.2(a), 820(a), Cal. Veh. Code §§*  
9 *17001, 17002, 17150, 21052, 21056 Against Defendants City of San Diego and Does 26 through 50)*

10 42. PLAINTIFFS hereby re-allege and incorporate by reference each and every preceding  
11 paragraph as though fully set forth herein.

12 43. CITY, through its officers and agents, including Officer JACKSON CARROLL owed a  
13 general duty of ordinary care to avoid injuring others, including while operating a police vehicle. (Cal.  
14 Civil Code § 1714; Cal. Gov. Code § 820(a).) CITY’s SDPD officers, including Officer JACKSON  
15 CARROLL, were also required to abide by the rules set forth in the California Vehicle Code, San Diego  
16 Police Department Procedures, and State of California Commission on Peace Officer Standards and  
17 Training (“POST”) while operating their vehicles in the course and scope of their employment. (Cal.  
18 Veh. Code § 21052; § 21056; Cal. Gov. Code § 815.6.)

19 44. Officer JACKSON CARROLL, CITY, and DOES 26-50 breached this duty by  
20 negligently initiating, continuing, and conducting a police pursuit and negligently operating a vehicle in  
21 violation of due care, the vehicle code, and the law, and thereby causing a collision with PLAINTIFFS’  
22 vehicle.

23 45. Officer JACKSON CARROLL, CITY, and DOES 26-50’s negligently operated their  
24 vehicles by, without limitation, continuing the pursuit, failing to prevent the Subject Incident, driving too  
25 fast for conditions, pursuing SALGADO at a high rate of speed on public filled roads in dark conditions,  
26 failing to call off the pursuit, failing to maintain radio contact, failing to follow the pursuit policy, failing  
27 to acquire supervisor approval to continue the pursuit, and failing to take measures to clear the roads.

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1           46. During the pursuit, CITY's SDPD Officers, including but not limited to Officer  
2 JACKSON CARROLL failed to drive with due regard for the safety of all persons on the highway; failed  
3 to utilize safe driving habits and to drive in a reasonable manner; failed to recognize the dangers involved  
4 in driving a law enforcement vehicles; failed to drive at a speed that is safe for existing conditions; failed  
5 to yield the right of way when necessary; failed to make reasonably prudent choices while driving; and  
6 violated the due care test.

7           47. Defendant CITY and DOES 26-50 negligently failed to monitor or appropriately terminate  
8 the pursuit so that public safety was ensured. On information and belief, CITY failed to adequately train,  
9 monitor, and supervise officers regarding public safety during high-speed pursuits. Defendant CITY  
10 failed to adequately equip officers' vehicles by, without limit, failing to provide adequate radio contact,  
11 and failing to provide adequate measures to stop Defendant SALGADO's vehicle.

12           48. Officer JACKSON CARROLL, CITY, and DOES 26-50's negligence caused and/or was  
13 a substantial factor in causing the Subject Incident and PLAINTIFFS' damages. These defendants'  
14 negligence caused and/or was a substantial factor in causing the Subject Incident, MALIKAI ELIAS  
15 OROZCO-ROMERO and MASON MANUEL OROZCO-ROMERO's deaths, and PLAINTIFFS'  
16 harms.

17           49. Plaintiff VICTORIA HAYES was present at the scene and witnessed the entire incident  
18 and perceived the deaths of her two sons, MALIKAI ELIAS OROZCO-ROMERO and MASON  
19 MANUEL OROZCO-ROMERO.

20           50. As a direct and proximate result of Officer JACKSON CARROLL, CITY, and DOES 26-  
21 50's negligence, Plaintiffs HAYES and MARTINEZ were harmed, decedents MALIKAI ELIAS  
22 OROZCO-ROMERO and MASON MANUEL OROZCO-ROMERO were killed, and Plaintiff  
23 VICTORIA HAYES has suffered the wrongful deaths of MALIKAI and MASON.

24           51. As a direct result of Defendants' negligence which caused injury and death to her sons,  
25 Plaintiff VICTORIA HAYES suffered serious emotional distress, including suffering, anguish, fright,  
26 horror, nervousness, grief, anxiety, worry, shock, humiliation, and shame.

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1 52. As a further proximate result of Defendants' negligence, decedents MALIKAI ELIAS  
2 OROZCO-ROMERO and MASON MANUEL OROZCO-ROMERO suffered special damages, prior to  
3 their deaths, including medical expenses.

4 53. As a further proximate result of Defendants' negligence, decedents MALIKAI ELIAS  
5 OROZCO-ROMERO and MASON MANUEL OROZCO-ROMERO suffered pain, suffering, and  
6 disfigurement prior to their deaths.

7 54. As a further proximate result of Officer JACKSON CARROLL, CITY, and DOES 26-  
8 50's negligence, PLAINTIFFS suffered, and continue to suffer general damages, special damages, and  
9 all other damages allowable by law.

10 55. Upon information and belief, Defendant CITY is liable to PLAINTIFFS for the injuries  
11 they sustained as a result of the Subject Incident caused by the negligent and wrongful acts by its  
12 employee, Officer JACKSON CARROLL and DOES 26-50, while operating a vehicle in the course and  
13 scope of their employment with CITY. (Cal. Gov. Code §§ 815.2(a), 820(a); Cal. Veh. Code §§ 17001,  
14 17002, 17150.)

15 56. The acts and/or omissions of the CITY, by and through its agents, departments, servants,  
16 employees, and/or independent contractors, including the SDPD and Officer JACKSON CARROLL,  
17 were the proximate cause of, and a substantial factor in causing the injuries and harm to PLAINTIFFS.

18 **THIRD CAUSE OF ACTION**

19 ***(Breach of Mandatory Duties Against Defendants CITY and Does 26 through 50)***

20 57. PLAINTIFFS hereby re-allege and incorporate by reference each and every preceding  
21 paragraph as though fully set forth herein.

22 58. CITY's SDPD officers, including Officer JACKSON CARROLL, were required to abide  
23 by the rules set forth in the California Vehicle Code, San Diego Police Department Procedures, and State  
24 of California Commission on Peace Officer Standards and Training ("POST") while operating their  
25 vehicles in the course and scope of their employment. (Cal. Veh. Code § 21052; § 21056; Cal. Gov.  
26 Code § 815.6.)

27 59. Upon information and belief, CITY failed to have a proper pursuit policy in place and/or  
28 failed to properly train its officers and agents as to the policy and/or failed to obtain certification of such

1 training, review, or understanding of such policy. Additionally, any policy of the CITY and/or SDPD  
2 concerning pursuits failed to meet the required minimum standards.

3 60. The initiation of the pursuit of SALGADO was unnecessary and in violation of the law  
4 and/or SDPD policies and procedures. SDPD initiated pursuit prior to a showing that SALGADO failed  
5 to yield to a police vehicle operating with emergency lights and siren activated. Further, SDPD, by and  
6 through its officers and agents, did not have probable cause SALGADO committed an infraction or  
7 misdemeanor in their presence or that a felony had been or was being committed. SDPD made an  
8 incorrect assumption that simply by virtue of his fleeing, SALGADO was a serious criminal suspect. At  
9 the time of initiating and/or while continuing the pursuit, there was no need to protect the public from  
10 SALGADO nor any apparent need to immediately capture him.

11 61. Further, CITY and SDPD failed to properly assess the pedestrian and vehicular traffic  
12 patterns and volume, time of day, speed, capabilities and conditions of the involved vehicles, quality of  
13 radio communication, safety of occupants of the involved vehicles, weather and visibility, road  
14 conditions, capabilities and condition of the involved personnel, and ability to apprehend the suspect at  
15 a later time. CITY and SDPD initiated and continued the pursuit of SALGADO through heavily  
16 populated and high traffic areas where a significant risk of injury or death to bystanders was readily  
17 apparent. More than two units were involved in the pursuit and the pursuing units failed to properly  
18 utilize the required lights and sirens and warnings to other drivers on the roadway.

19 62. Additionally, CITY and SDPD had the obligation to cease pursuit when the benefits of  
20 immediate apprehension are outweighed by the hazards of continuing the pursuit. CITY and SDPD  
21 failed to properly balance the seriousness of SALGADO's suspected crime or violation against the  
22 inherent risks of engaging in pursuit, including the foreseeable deaths and injury of PLAINTIFFS herein  
23 and potential for damage to personal or CITY property. As a result, CITY and SDPD failed to terminate  
24 the pursuit – even though doing so was in the best interest of public safety.

25 63. CITY and SDPD failed to follow the required communications procedures and  
26 responsibilities to conduct a pursuit. The pursuing officer failed to state the required information  
27 concerning the pursuit on the radio as required under CITY and SDPD policy.

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1           64.     CITY and SDPD should have terminated the pursuit and allowed CHP to take over once  
2 the pursuit ended up on the highway. CITY and SDPD failed to abandon the pursuit and allow CHP to  
3 take over.

4           65.     During the pursuit, CITY and SDPD officers: failed to drive with due regard for the safety  
5 of all persons on the highway; failed to utilize safe driving habits and to drive in a reasonable manner;  
6 failed to recognize the dangers involved in driving a law enforcement vehicles; failed to drive at a speed  
7 that is safe for existing conditions; failed to yield the right of way when necessary; failed to make good  
8 choices while driving; and violated the due care test.

9           66.     As a direct result of CITY and SDPD’s failures to abide by California law, their mandatory  
10 duties, California Vehicle Code, SDPD Pursuit policies, and POST policies, the pursuit of SALGADO  
11 was initiated and continued without regard to the risk to the public and led directly to the striking of  
12 PLAINTIFFS’ vehicle, injuries to all PLAINTIFFS, and the wrongful deaths of MALIKAI and MASON.  
13 Injury and/or death to the public, such as PLAINTIFFS, was highly foreseeable as a result of the police  
14 chase. The enactments, rules, policies, and procedures CITY and SDPD failed to abide by were enacted  
15 to protect the public from the type of harm suffered by PLAINTIFFS. CITY and SDPD’s failures were  
16 a substantial factor in causing harm to PLAINTIFFS.

17           67.     The acts and/or omissions of the CITY, by and through its agents, servants, employees,  
18 and independent contractors, including the SAN DIEGO POLICE DEPARTMENT and JACKSON  
19 CARROLL, constituted a breach of mandatory duties. (Cal. Gov. Code § 815.6.) The duties violated by  
20 the acts and/or omissions of the CITY, by and through its agents, servants, employees, and independent  
21 contractors, including the SAN DIEGO POLICE DEPARTMENT and JACKSON CARROLL, in  
22 addition to the Vehicle Code sections referenced in the second cause of action, include but are not limited  
23 to:

- 24           a. A failure to drive with due regard for the safety of all persons using the highway;
- 25           b. A failure to utilize safe driving habits, and to drive in a reasonable manner; including but  
26           not limited to the following express violations of the California Commission on Peace  
27           Officers Standards and Training (POST), which exists under the authority of, and in  
28           compliance with, California Penal Code sections 13503, 13506, and 13510:



- 1 i. A failure to recognize the dangers involved in driving a law enforcement vehicle;  
2 and/or;  
3 ii. A failure to drive at the speed that is safe for existing conditions; and/or  
4 iii. A failure to yield the right of way when necessary; and/or  
5 iv. A failure to make good and safe choices while driving.
- 6 c. A failure to follow proper procedure while undergoing a police pursuit in express  
7 violation of the California Commission on Peace Officers Standards and Training  
8 (POST):
- 9 d. A failure to use proper Emergency Driving techniques, including a violation of the “Due  
10 Care Test”:
- 11 i. Officers fail to exercise due care if: 1) they violate a statute, ordinance, or  
12 regulation of their agency; and 2) the violation causes death, injury, or property  
13 damage.
- 14 e. A failure to adequately train, supervise and discipline police officers to ensure they  
15 comply with applicable duties, procedures, laws and rules of driver safety.

16 68. These enactments are intended to protect against risk of the kind of injuries suffered by  
17 PLAINTIFFS. Defendant CITY’s breach of these mandatory duties was a proximate cause of and a  
18 substantial factor in causing the deaths of MALIKAI ELIAS OROZCO-ROMERO and MASON  
19 MANUEL OROZCO-ROMERO, personal injuries to Plaintiffs VICTORIA HAYES and LIZBETH  
20 MARTINEZ, and serious harm to PLAINTIFFS.

21 69. Plaintiff VICTORIA HAYES was present at the scene and witnessed the entire incident  
22 and perceived the deaths of her two sons, MALIKAI ELIAS OROZCO-ROMERO and MASON  
23 MANUEL OROZCO-ROMERO.

24 70. As a direct and proximate result of Defendants CITY and DOES 26-50’s breach of  
25 mandatory duties, Plaintiffs HAYES and MARTINEZ were harmed, decedents MALIKAI ELIAS  
26 OROZCO-ROMERO and MASON MANUEL OROZCO-ROMERO were killed, and Plaintiff  
27 VICTORIA HAYES and all rightful heirs have suffered the wrongful death of MALIKAI and MASON.

28 ///



# Exhibit 1

1 Robert Hamparyan (SBN 181934)  
2 Jamie M. Ritterbeck (SBN 286151)  
3 Corey C. Garrard (SBN 308003)  
4 **HAMPARYAN PERSONAL INJURY**  
5 **LAWYERS SAN DIEGO, APC**  
6 275 West Market Street  
7 San Diego, CA 92101  
8 Telephone: (619) 550-1355  
9 Fax: (619) 550-1356

10 Attorneys for Plaintiffs, VICTORIA HAYES and LIZBETH MARTINEZ

11  
12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **FOR THE COUNTY OF SAN DIEGO – NORTH COUNTY**  
14

15 VICTORIA HAYES, individually and as  
16 Successor in Interest to Malikai Elias  
17 Orozco-Romero and Mason Manuel  
18 Orozco-Romero; LIZBETH MARTINEZ,  
19 an individual,

20 Plaintiffs,

21 vs.

22 CITY OF SAN DIEGO a California City;  
23 ANGEL VELASQUEZ SALGADO, an  
24 individual; and DOES 1 through 50,  
25 inclusive

26 Defendants.

Case No: \_\_\_\_\_

**DECLARATION OF VICTORIA HAYES  
PURSUANT TO CODE OF CIVIL  
PROCEDURE SECTION 337.32**

27 I, Victoria Hayes, declare as follows:

28 1. I am over the age of 18 years. I have personal knowledge of the facts contained in this  
declaration, and if called as a witness I could and would testify competently to the truth of the facts  
stated herein.

2. I am the biological mother of Decedents, MALIKAI ELIAS OROZCO-ROMERO and  
MASON MANUEL OROZCO-ROMERO (collectively, "Decedents"), who died on December 8, 2023,  
in San Diego, California.

1           3.     No proceeding is now pending in the State of California for administration of the  
2 Decedents' Estates.

3           4.     I am the Decedents' successor in interest (as defined in Section 377.11 of the California  
4 Code of Civil Procedure) and succeed to the Decedents' interest in the above-captioned action.

5           5.     No other person has a superior right to commence the above-captioned action or to be  
6 substituted for Decedents in the above-captioned action.

7           6.     True and correct copies of Decedents' death certificates are attached to this declaration  
8 as **Exhibit A**.

9           7.     I declare under penalty under the laws of the State of California that the forgoing is true  
10 and correct and that this declaration is executed on 12/3/2024 in San Diego, California.

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Signed by:  
By:   
c25E9D16C839492...  
Victoria Hayes

# Exhibit A



# STATE OF CALIFORNIA

## CERTIFICATION OF VITAL RECORD

### COUNTY OF SAN DIEGO

1 of 3

STATE FILE NUMBER <b>3202337022931</b>		<b>CERTIFICATE OF DEATH</b>		LOCAL REGISTRATION NUMBER	
1. NAME OF DECEDENT - FIRST (Given) <b>MALIKA</b>		2. MIDDLE		3. LAST (Family) <b>ROMERO</b>	
4. DATE OF BIRTH mm/dd/yyyy <b>09/14/2015</b>		5. AGE Yrs <b>8</b>		6. SEX <b>M</b>	
9. BIRTH STATE/FOREIGN COUNTRY <b>UNK</b>		10. SOCIAL SECURITY NUMBER <b>UNK</b>		11. EVER IN U.S. ARMED FORCES? <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> UNK	
13. EDUCATION - Highest Level Degree (Don't work on back) <b>UNKNOWN</b>		14. WAS DECEDENT HISPANIC/LATINE/SPANISH? (If yes, see worksheet or back) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> UNK		12. DATE OF DEATH mm/dd/yyyy <b>12/08/2023</b>	
17. USUAL OCCUPATION - Type of work for most of life. DO NOT USE RETIRED <b>UNKNOWN</b>		16. DECEDENT'S RACE - Use 10 3 races may be listed (see worksheet on back) <b>OTHER HISPANIC</b>		19. HOURS IN OCCUPATION <b>UNK</b>	
20. DECEDENT'S RESIDENCE (Street and number, or location) <b>UNK</b>		18. KIND OF BUSINESS OR INDUSTRY (e.g., grocery store, road construction, employment agency, etc.) <b>UNKNOWN</b>		19. HOURS IN OCCUPATION <b>UNK</b>	
21. CITY <b>UNK</b>		22. COUNTY/PROVINCE <b>UNK</b>		23. ZIP CODE <b>UNK</b>	
24. YEARS IN COUNTY <b>UNK</b>		25. STATE/FOREIGN COUNTRY <b>UNK</b>		26. INFORMANT'S NAME, RELATIONSHIP <b>UNK</b>	
27. INFORMANT'S MAILING ADDRESS (Street and number, or full route number, city or town, state and zip) <b>5570 OVERLAND AVE., SAN DIEGO, CA 92123</b>		28. NAME OF SURVIVING SPOUSE/SPOUSE-FIRST <b>UNKNOWN</b>		29. MIDDLE <b>UNKNOWN</b>	
30. LAST (BIRTH NAME) <b>UNKNOWN</b>		31. NAME OF FATHER/PARENT-FIRST <b>UNKNOWN</b>		32. MIDDLE <b>UNKNOWN</b>	
33. LAST <b>UNKNOWN</b>		34. BIRTH STATE <b>UNK</b>		35. NAME OF MOTHER/PARENT-FIRST <b>UNKNOWN</b>	
36. MIDDLE <b>UNKNOWN</b>		37. LAST (BIRTH NAME) <b>UNKNOWN</b>		38. BIRTH STATE <b>UNK</b>	
39. DISPOSITION DATE mm/dd/yyyy		40. PLACE OF FINAL DISPOSITION		41. TYPE OF DISPOSITION(S) <b>PENDING CORONER INVESTIGATION</b>	
42. SIGNATURE OF EMBALMER <b>NOT EMBALMED</b>		43. LICENSE NUMBER		44. NAME OF FUNERAL ESTABLISHMENT <b>S.D. MEDICAL EXAMINER'S OFFICE</b>	
45. LICENSE NUMBER <b>NONE</b>		46. SIGNATURE OF LOCAL REGISTRAR <b>WILMA WOOTEN MD</b>		47. DATE mm/dd/yyyy <b>12/18/2023</b>	
101. PLACE OF DEATH <b>RADY CHILDREN'S HOSPITAL - SAN DIEGO</b>		102. IF HOSPITAL, SPECIFY ONE <input type="checkbox"/> Hosp <input checked="" type="checkbox"/> EXOP <input type="checkbox"/> TDA <input type="checkbox"/> Hosp/ETC		103. IF OTHER THAN HOSPITAL, SPECIFY ONE <input type="checkbox"/> Home <input type="checkbox"/> Hosp <input type="checkbox"/> Other	
104. COUNTY <b>SAN DIEGO</b>		105. FACILITY ADDRESS OR LOCATION WHERE FOUND (Street and number, or location) <b>3020 CHILDRENS WAY</b>		106. CITY <b>SAN DIEGO</b>	
107. CAUSE OF DEATH Enter the chain of events - diseases, injuries, or complications - that directly caused death. DO NOT enter terminal events such as cardiac arrest, respiratory arrest, or ventricular fibrillation without showing the etiology. DO NOT ABBREVIATE. IMMEDIATE CAUSE (Final disease or condition on which death occurred) <b>(A) MULTIPLE BLUNT FORCE INJURIES</b>		108. DEATH REPORTED TO CORONER? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		109. BIOPSY PERFORMED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
110. AUTOPSY PERFORMED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		111. USED IN DETERMINING CAUSE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		112. OTHER SIGNIFICANT CONDITIONS CONTRIBUTING TO DEATH; BUT NOT RESULTING IN THE UNDERLYING CAUSE GIVEN IN 107 <b>NONE</b>	
113. WAS OPERATION PERFORMED FOR ANY CONDITION IN ITEM 107 OR 112? (If yes, list type of operation and date) <b>LEFT THORACOSTOMY TUBE PLACEMENT, 12/08/2023</b>		113A. OCCURRED IN REGIONS IN LAST YEAR? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK		114. CERTIFY THAT TO THE BEST OF MY KNOWLEDGE DEATH OCCURRED AT THE HOUR, DATE, AND PLACE STATED FROM THE CAUSES STATED. Decedent Attended Since: (A) mm/dd/yyyy (B) mm/dd/yyyy	
115. SIGNATURE AND TITLE OF CERTIFIER <b>BETHANN SCHABER</b>		116. LICENSE NUMBER		117. DATE mm/dd/yyyy	
118. TYPE ATTENDING PHYSICIAN'S NAME, MAILING ADDRESS, ZIP CODE		119. CERTIFY THAT IN MY OPINION DEATH OCCURRED AT THE HOUR, DATE, AND PLACE STATED FROM THE CAUSES STATED. MANNER OF DEATH: <input type="checkbox"/> Natural <input checked="" type="checkbox"/> Accident <input type="checkbox"/> Homicide <input type="checkbox"/> Suicide <input type="checkbox"/> Hanging <input type="checkbox"/> Poisoning <input type="checkbox"/> Could Not Be Determined		120. INJURED AT WORK? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK	
121. INJURY DATE mm/dd/yyyy <b>12/08/2023</b>		122. HOUR (24-hour) <b>UNK</b>		123. PLACE OF INJURY (e.g., home, construction site, wooded area, etc.) <b>STREET AND/OR HIGHWAY</b>	
124. DESCRIBE HOW INJURY OCCURRED (Events which resulted in injury) <b>PASSENGER, PPV, COLLIDED WITH PPV</b>		125. LOCATION OF INJURY (Street and number, or local on, and city, and zip) <b>S/B ISR 805 AT 43RD STREET, OFF RAMP, SAN DIEGO, CA 92102</b>		126. SIGNATURE OF CORONER / DEPUTY CORONER <b>BETHANN SCHABER</b>	
127. DATE mm/dd/yyyy <b>12/14/2023</b>		128. TYPE NAME, TITLE OF CORONER / DEPUTY CORONER <b>BETHANN SCHABER, DME</b>		STATE REGISTRAR	

County of San Diego - Health & Human Services Agency - 5560 Overland Avenue. This is to certify that, if bearing the OFFICIAL SEAL OF THE STATE OF CALIFORNIA, the OFFICIAL SEAL OF SAN DIEGO COUNTY AND THEIR DEPARTMENT OF HEALTH SERVICES EMBOSSED SEAL, this is a true copy of the ORIGINAL DOCUMENT FILED. This copy not valid unless prepared on engraved border displaying seal and signature of Registrar.

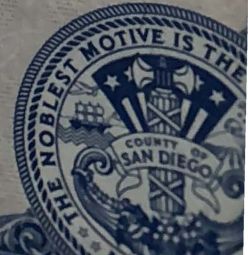
*Wilma J. Wooten, M.D.*

DATE ISSUED: 1/31/2024

WILMA J. WOOTEN, M.D., M.P.H.  
REGISTRAR OF VITAL RECORDS  
County of San Diego

A004377921

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE





# STATE OF CALIFORNIA

## CERTIFICATION OF VITAL RECORD

### COUNTY OF SAN DIEGO

**CERTIFICATE OF DEATH**  
STATE OF CALIFORNIA  
USE BLACK INK ONLY / NO RED INK / NO STAMPS OR ALTERATIONS

3202337022932

STATE FILE NUMBER		LOCAL REGISTRATION NUMBER	
1. NAME OF DECEDENT - FIRST (Given) <b>MASON</b>		3. LAST (Family) <b>ROMERO</b>	
AKA ALSO KNOWN AS - Include full AKA (FIRST, MIDDLE, LAST)		4. DATE OF BIRTH mm/dd/yyyy <b>07/20/2019</b>	
8. BIRTH STATE/FOREIGN COUNTRY <b>UNK</b>		5. AGE Yrs <b>4</b>	
10. SOCIAL SECURITY NUMBER <b>UNK</b>		7. US BIRTH YEAR <b>UNK</b>	
11. EVER IN U.S. ARMED FORCES? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK		12. MARITAL STATUS (at time of Death) <b>UNK</b>	
13. EDUCATION - Highest Level (Degree) (Use worksheet on back) <b>UNK</b>		14. DATE OF DEATH mm/dd/yyyy <b>12/08/2023</b>	
14.15. WAS DECEDENT HISPANIC/LATINO/SPANISH? (If yes, see worksheet on back) <input checked="" type="checkbox"/> YES <b>OTHER HISPANIC</b>		16. DECEDENT'S RACE - (Up to 3 races may be listed (see worksheet on back)) <b>OTHER HISPANIC</b>	
17. USUAL OCCUPATION - Type of work for most of life. DO NOT USE RETIRED		18. KIND OF BUSINESS OR INDUSTRY (e.g., grocery store, road construction, employment agency, etc.)	
<b>UNK</b>		<b>UNK</b>	
19. YEARS IN OCCUPATION <b>UNK</b>			
20. DECEDENT'S RESIDENCE (Street and number, or location) <b>UNK</b>			
21. CITY <b>UNK</b>		22. COUNTY/PROVINCE <b>UNK</b>	
23. ZIP CODE <b>UNK</b>		24. YEARS IN COUNTY <b>UNK</b>	
25. STATE/FOREIGN COUNTRY <b>UNK</b>		26. INFORMANT'S NAME, RELATIONSHIP <b>UNDER INVESTIGATIONS, ME OFFICE</b>	
27. INFORMANT'S MAILING ADDRESS (Street and number or rural route number, city or town, state and zip)		<b>5570 OVERLAND AVE., SAN DIEGO, CA 92123</b>	
28. NAME OF SURVIVING SPOUSE/ROSP - FIRST <b>UNK</b>		29. MIDDLE <b>UNK</b>	
30. LAST (BIRTH NAME) <b>UNK</b>		31. NAME OF FATHER/PARENT - FIRST <b>UNK</b>	
32. MIDDLE <b>UNK</b>		33. LAST <b>UNK</b>	
34. BIRTH STATE <b>UNK</b>		35. NAME OF MOTHER/PARENT - FIRST <b>UNK</b>	
36. MIDDLE <b>UNK</b>		37. LAST (BIRTH NAME) <b>UNK</b>	
38. BIRTH STATE <b>UNK</b>		39. DISPOSITION DATE mm/dd/yyyy	
40. PLACE OF FINAL DISPOSITION		41. TYPE OF DISPOSITIONS <b>PENDING CORONER INVESTIGATION</b>	
42. SIGNATURE OF EMBALMER <b>NOT EMBALMED</b>		43. LICENSE NUMBER	
44. NAME OF FUNERAL ESTABLISHMENT <b>S.D. MEDICAL EXAMINER'S OFFICE</b>		45. LICENSE NUMBER <b>NONE</b>	
46. SIGNATURE OF LOCAL REGISTRAR <b>WILMA WOOTEN MD</b>		47. DATE mm/dd/yyyy <b>12/18/2023</b>	
101. PLACE OF DEATH <b>RADY CHILDREN'S HOSPITAL - SAN DIEGO</b>		102. IF HOSPITAL, SPECIFY ONE <input type="checkbox"/> Inpatient <input checked="" type="checkbox"/> ER/OP <input type="checkbox"/> DCA <input type="checkbox"/> Hospice <input type="checkbox"/> Nursing Home <input type="checkbox"/> Decedent's Home <input type="checkbox"/> Other	
104. COUNTY <b>SAN DIEGO</b>		105. FACILITY ADDRESS OR LOCATION WHERE FOUND (Street and number, or location) <b>3020 CHILDRENS WAY</b>	
106. CITY <b>SAN DIEGO</b>		107. CAUSE OF DEATH From the chain of events - diseases, injuries, or complications - that directly caused death. DO NOT enter terminal events such as cardiac arrest, respiratory arrest, or ventricular fibrillation without showing the etiology. DO NOT ABBREVIATE. <b>(A) MULTIPLE BLUNT FORCE INJURIES</b>	
108. DEATH REPORTED TO CORONER? (A) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		109. DEATH REPORTED TO CORONER? (B) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
110. DEATH REPORTED TO CORONER? (C) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		111. USED IN DETERMINING CAUSE? (D) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
112. OTHER SIGNIFICANT CONDITIONS CONTRIBUTING TO DEATH BUT NOT RESULTING IN THE UNDERLYING CAUSE GIVEN IN 107. <b>NONE</b>			
113. WAS OPERATION PERFORMED FOR ANY CONDITION IN ITEM 107 OR 112? (If yes, list type of operation and date.) <b>NO</b>			
114. I CERTIFY THAT TO THE BEST OF MY KNOWLEDGE DEATH OCCURRED AT THE HOUR, DATE, AND PLACE STATED FROM THE CAUSES STATED. Decedent: <b>Attended Since</b> Decedent: <b>Last Seen Alive</b>		115. SIGNATURE AND TITLE OF CERTIFIER <b>WILMA WOOTEN MD</b>	
116. LICENSE NUMBER		117. DATE mm/dd/yyyy	
118. TYPE/ATTENDING PHYSICIAN'S NAME, MAILING ADDRESS, ZIP CODE			
119. CERTIFY THAT IN MY OPINION DEATH OCCURRED AT THE HOUR, DATE, AND PLACE STATED FROM THE CAUSES STATED. MANNER OF DEATH: <input type="checkbox"/> Natural <input checked="" type="checkbox"/> Accident <input type="checkbox"/> Homicide <input type="checkbox"/> Suicide <input type="checkbox"/> Hanging <input type="checkbox"/> Drowning <input type="checkbox"/> Suffocation <input type="checkbox"/> Other (Specify):		120. INJURED AT WORK? <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> UNK	
121. INJURY DATE mm/dd/yyyy <b>12/08/2023</b>		122. HOUR (24 Hours) <b>UNK</b>	
123. PLACE OF INJURY (e.g. home, construction site, wooded area, etc.) <b>STREET AND/OR HIGHWAY</b>			
124. DESCRIBE HOW INJURY OCCURRED (Events which resulted in injury) <b>PASSENGER, PPV, COLLIDED WITH PPV</b>			
125. LOCATION OF INJURY (Street and number, or location, and city, and zip) <b>S/B ISR 805 AT 43RD STREET, OFF RAMP, SAN DIEGO, CA 92102</b>			
126. SIGNATURE OF CORONER / DEPUTY CORONER <b>BETHANN SCHABER</b>		127. DATE mm/dd/yyyy <b>12/13/2023</b>	
128. TYPE NAME, TITLE OF CORONER / DEPUTY CORONER <b>BETHANN SCHABER, DME</b>		129. TYPE NAME, TITLE OF CORONER / DEPUTY CORONER	
STATE REGISTRAR		FAX AUTH.#	
A		B	
C		D	
E		CENSUS TRACT	

1 of 3

County of San Diego - Health & Human Services Agency - 5560 Overland Avenue. This is to certify that, if bearing the OFFICIAL SEAL OF THE STATE OF CALIFORNIA, the OFFICIAL SEAL OF SAN DIEGO COUNTY and THEIR DEPARTMENT OF HEALTH SERVICES EMBOSSED SEAL, this is a true copy of the ORIGINAL DOCUMENT FILED. This copy not valid unless prepared on engraved border displaying seal and signature of Registrar.

*Wilma J. Wooten, M.D.*

DATE ISSUED: 1/31/2024

WILMA J. WOOTEN, M.D., M.P.H.  
REGISTRAR OF VITAL RECORDS  
County of San Diego

A004377912

ANY ALTERATION OR ERASURE voids THIS CERTIFICATE

