



**CITY OF RIALTO
LIABILITY
CLAIM FOR DAMAGES
TO PERSON OR PROPERTY**

CITY CLERK'S DATE STAMP
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1. Claims for death, injury to person, or to personal property must be filed not later than six (6) months after the occurrence (Gov. Code §911.2).
2. Claims for damages to real property must be filed not later than one (1) year after the occurrence (Gov. Code §911.2).
3. READ ENTIRE CLAIM FOR BEFORE FILING
4. ATTACH SEPARATE SHEETS, IF NECESSARY, TO GIVE FULL DETAILS

RETURN TO:
Rialto City Clerk's Office
Mail: 150 S. Palm Ave., Rialto, CA 92376
Address: 290 W. Rialto Ave., Rialto, CA 92376

CLAIMANT INFORMATION:

_____	_____
FULL NAME	DATE OF BIRTH
_____	_____
HOME ADDRESS INCLUDING CITY, STATE & ZIP	HOME TELEPHONE NO.
_____	_____
BUSINESS ADDRESS INCLUDING CITY, STATE & ZIP	BUSINESS TELEPHONE NO.
ADDRESS AT WHICH CLAIMANT DESIRES TO RECEIVE NOTICES OR COMMUNICATIONS REGARDING THIS CLAIM (if different from home address provided above):	_____
	<u>c/o 11111 Santa Monica Blvd Ste 700 Los Angeles, CA 90025</u>

1. WHEN DID DAMAGE OR INJURY OCCUR? DATE: October 17, 2025 TIME: 04:00 AM PM

2. PLACE OF ACCIDENT (OCCURRENCE) BE SPECIFIC – Describe fully and (if applicable) locate on diagram on reverse side of this sheet. Where appropriate, give street names and addresses, measurements and landmarks.

The collision occurred at or near the intersection of Mango Avenue and San Bernardino Avenue ("the subject intersection") in the City of Rialto, County of San Bernardino, State of California. Please see Exhibit A.

3. HOW DID DAMAGE OR INJURY OCCUR?

On October 17, 2025, claimant Ricardo Vasquez suffered severe injuries as a result of a collision in the City of Rialto, County of San Bernardino, State of California. At that time, Sharlenea Addison was operating a school bus on behalf of the Rialto Unified School District and Student Transportation of America. Claimant Ricardo Vasquez was struck by the school bus while he was lawfully crossing the street inside a crosswalk. Please see Exhibit A.

4. WERE POLICE AT THE SCENE? YES NO WERE PARAMEDICS AT THE SCENE? YES NO

5. WHAT PARTICULAR ACT OR OMISSION DO YOU CLAIM CAUSED THE INJURY OR DAMAGES? Give the name of the city/town employee causing the injury or damage, if known.

Agents and employees of the City of Rialto whose identities are currently unknown to claimant. Please see Exhibit A.

6. GIVE TOTAL AMOUNT OF CLAIM Include estimate of amount of any prospective injury or damage \$ 50,000,000.00

HOW WAS THE ABOVE AMOUNT COMPUTED? Be specific, list doctor bills, repair estimates, etc. **Please attach 2 estimates.**

DAMAGES INCURRED TO DATE:

Item/Date: _____	Amount: \$ _____
Item/Date: _____	Amount: \$ _____

TOTAL AMOUNT CLAIMED AS OF PRESENTATION OF THIS CLAIM: \$ _____

ESTIMATED PROSPECTIVE DAMAGES, AS FAR AS KNOWN:

Item/Date: Please see Exhibit A. Amount: \$ 50,000,000.00

Item/Date: _____ Amount: \$ _____

TOTAL ESTIMATED AMOUNT PROSPECTIVE DAMAGES: \$ 50,000,000.00

7. WITNESSES TO DAMAGE OR INJURY *List all persons known to have information (attach additional pages, if necessary)*

NAME: Please see Exhibit A.

NAME: _____

ADDRESS: _____

ADDRESS: _____

TELEPHONE: () _____

TELEPHONE: () _____

8. IF INJURED, PROVIDE NAME, CONTACT INFORMATION AND DATE/TIME DOCTOR(S) OR HOSPITAL(S) VISITED:

NAME: Arrowhead Regional Medical Center

NAME: Kindred Hospital Rancho

ADDRESS: 400 N Pepper Avenue Colton, CA 92324

ADDRESS: 10841 White Oak Ave, Rancho Cucamonga, CA 91730

TELEPHONE: (877) 873-2762

TELEPHONE: (909) 581-6400

DATE: 10/17/2025 TIME: AM PM

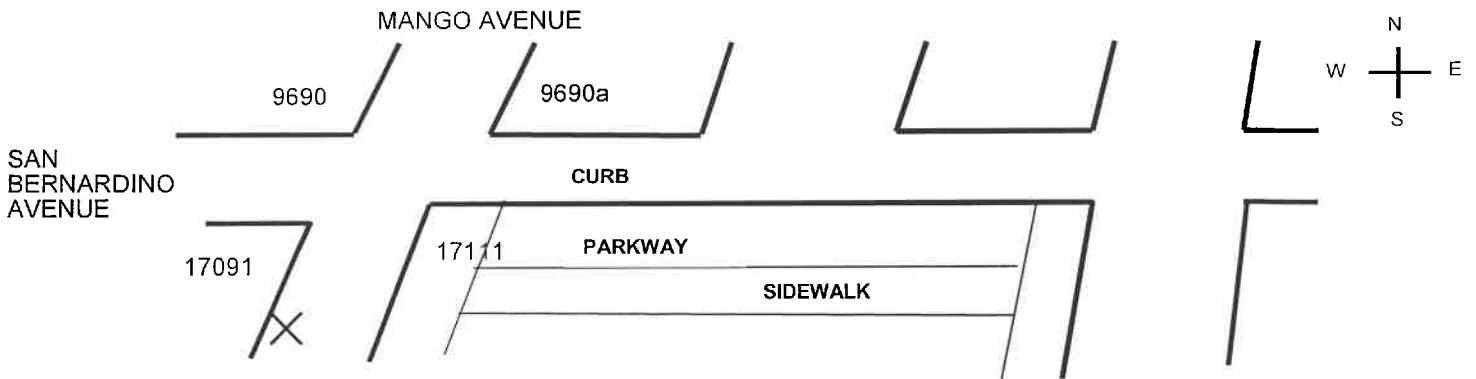
DATE: 11/14/25 TIME: AM PM

9. PLEASE READ THE FOLLOWING CAREFULLY:

For all vehicle accident claims, place on the following diagram, the names of streets, including NORTH, EAST, SOUTH AND WEST directions. Indicate place of accident by "X" and by showing house numbers or distances to street corners.

If a city/town vehicle was involved, designate by letter "A" location of the City/Town vehicle when you first saw it, and by "B" location of yourself or your vehicle when you first saw City/Town vehicle; location of City/Town vehicle at time of accident by "A-1" and location of yourself or your vehicle at the time of the accident by "B-1" and the point of impact by "X". Please see Exhibit A.

⇒ NOTE: IF THE DIAGRAM BELOW DOES NOT FIT THE SITUATION, PLEASE ATTACH A PROPER DIAGRAM SIGNED BY THE CLAIMANT.



I HAVE READ THE FOREGOING CLAIM AND KNOW THE CONTENTS THEREOF; AND CERTIFY THAT THE SAME IS TRUE OF MY OWN KNOWLEDGE EXCEPT AS TO THOSE MATTERS WHICH ARE HEREIN STATED UPON MY INFORMATION AND BELIEF; AND AS TO THOSE MATTERS I BELIEVE THEM TO BE TRUE.

I CERTIFY (OR DECLARE) UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

SIGNATURE OF CLAIMANT OR AGENT

Robert B. Reagan
TYPE OR PRINT NAME

Attorney for Claimant
RELATIONSHIP TO CLAIMANT

04/07/2026
DATE

NOTE: PRESENTATION OF A FALSE CLAIM IS A FELONY (CA PENAL CODE 72)
RETURN CLAIM TO: RIALTO CITY CLERK'S OFFICE - 150 S. PALM AVE., RIALTO, CA 92376

1 PANISH | SHEA | RAVIPUDI LLP
2 ROBERT B. REAGAN, State Bar No. 299445
3 *breagan@panish.law*
4 11111 Santa Monica Boulevard, Suite 700
5 Los Angeles, California 90025
6 Telephone: 310.477.1700
7 Facsimile: 310.477.1699

8 Attorneys for Claimant, RICARDO VASQUEZ

9 RICARDO VASQUEZ, an Individual,,
10
11 Claimant,

12 v.

13 CITY OF RIALTO,
14
15 Respondent.

16 Case No. TBD

17 **EXHIBIT A –**
18 **CLAIM FOR DAMAGES**
19 **(Section 910 of the Government Code)**

20 CITY OF RIALTO
21 RECEIVED
22 CITY CLERK
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24 TO: CITY OF RIALTO

25 **YOU ARE HEREBY NOTIFIED** that RICARDO VASQUEZ (hereinafter, “Claimant”)
26 whose address is c/o 11111 Santa Monica Blvd., Suite 700, Los Angeles, CA 90025, claims
27 damages from the City of Rialto, in the amount of, computed as of the date of presentation of this
28 claim, in excess of \$50,000,000.00 (Fifty Million Dollars).

On October 17, 2025, claimant Ricardo Vasquez suffered severe injuries as a result of a collision that occurred at or near the intersection of Mango Avenue and San Bernardino Avenue (“the subject intersection”) in the City of Rialto, County of San Bernardino, State of California. At that time, Sharlenea Addison (“Addison”) was operating a school bus (“the school bus”) on behalf of the Rialto Unified School District (“RUSD”) and Student Transportation of America (“STA”). Claimant Ricardo Vasquez was struck by the school bus while he was lawfully crossing the street inside a crosswalk (“the collision”).

RUSD negligently designed, approved, and mandated the route taken by Addison at the time of the collision, thereby causing the collision and claimant’s injuries. RUSD negligently

1 directed heavy commercial school buses, including the school bus involved in the collision, to
2 perform complex left-hand turns across active pedestrian and scooter pathways at a 4-way stop
3 during peak after-school hours. RUSD failed to utilize safer, readily available alternative routes
4 that would have minimized conflict points between large commercial vehicles and sidewalk
5 traffic.

6 Furthermore, RUSD exerted unreasonable scheduling pressure on school bus drivers,
7 including Sharlenea Addison, which pressured Addison to hastily execute turns without properly
8 clearing the intersection. As a foreseeable result of the scheduling pressure exerted by RUSD on
9 school bus drivers, at the time of the collision Addison failed to maintain a proper lookout, failed
10 to properly scan the adjacent sidewalks and crosswalks, and failed to yield the right-of-way,
11 thereby causing the collision and claimant's injuries.

12 As a direct and proximate result of the negligence of RUSD and its agents and contractors,
13 claimant suffered severe personal injuries. The full extent of claimant's injuries is still being
14 assessed, but claimant is informed and believes he has incurred and will continue to incur
15 substantial medical expenses, lost earnings, loss of earning capacity, severe physical pain and
16 mental and emotional suffering in an amount exceeding \$50,000,000 (fifty million dollars).
17 Attached hereto as **Exhibit B** is the discharge summary describing some of the injuries suffered
18 by claimant in the collision.

19

20 All notices or other communications regarding this claim should be sent to Claimants at:

21 PANISH | SHEA | RAVIPUDI LLP
22 11111 Santa Monica Blvd., Suite 700
23 Los Angeles, CA 90025

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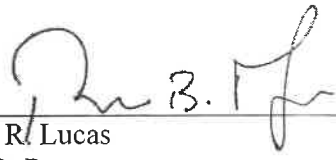
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DATED: April 7, 2026

PANISH | SHEA | RAVIPUDI LLP

By: 
Spencer R. Lucas
Robert B. Reagan
Attorneys for Claimant, RICARDO VASQUEZ

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EXHIBIT B

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EXHIBIT B

10/17/2025 - ED to Hosp-Admission (Discharged) in ARMC 4 North MICU (continued)

H&P Notes (continued)

mGycm NASCET criteria was utilized. MIPS reconstruction was performed on independent workstation for CT angiogram when applicable.

FINDINGS:

NECK CT ANGIOGRAM: Bilateral cervical carotid and vertebral arteries are patent. There is no evidence of dissection or significant stenosis. There is no contrast extravasation or soft tissue hematoma.

CHEST CT: The lungs are clear. There is a nonspecific 3.8 cm pulmonary cyst in the lower lobe of the left lung. The mediastinum is normal. There is no rib fractures or pneumothorax. There is no pleural effusion. There is no pericardial effusion.

ABDOMINAL CT: Liver, spleen, adrenals, kidneys, and pancreas are normal. Gallbladder is contracted with a small stone in the gallbladder neck. There is no abdominal free fluid.

PELVIC CT: Multiple injection granulomas are seen in the gluteal regions bilaterally. Soft tissue contusion cannot be excluded. The bony pelvis is intact. The bladder has normal contour. The pelvic organs are normal. There is no free fluid.

CERVICAL SPINE CT: Right occipital skull fracture is again noted. Alignment is normal. The vertebral bodies are intact. The disc spaces are preserved. The prevertebral soft tissue is normal.

THORACIC SPINE CT: Alignment is normal. The vertebral bodies are intact. The disc spaces are preserved. Paraspinal soft tissue is normal.

LUMBAR SPINE CT: Alignment is within normal limits. The vertebral bodies are intact. The disc spaces are preserved. Paraspinal soft tissue is normal.

Impression: 1. No evidence of vascular injury in the neck.

3. No acute abnormality in the chest, abdomen, pelvis. Incidental finding of left lung cyst and gallstone.

4. No acute spinal fracture. Right occipital skull fracture again seen.

CT head w/o contrast

Narrative: HISTORY: Trauma with pain

TECHNIQUE: CT of the brain without contrast. Exam was performed using dose lowering technique with adjustment of the mA and/or KV according to patient size. The Computed Tomography Dose Index (CTDIvol) is 62 mGy. DLP is 1294 mGycm

REFERENCE STUDY: Not available

FINDINGS: Right occipital skull fracture is seen extending superiorly to the right parietal skull.

Left-sided subarachnoid hemorrhages seen involving the frontal, parietal, and temporal cortical sulci. There is also a trace left tentorial subdural hematoma. Punctate parenchymal hemorrhages cannot be ruled out. There is no significant midline shift.

Orbits are symmetrical. Sinuses are normally aerated.

Impression: Right-sided skull fracture and left-sided extra-axial hemorrhage.

XR chest 1 view

Narrative: CHEST 1 VIEWS

ARMC Main Hospital
400 N Pepper Ave
Colton CA 92324-1819

Vasquez, Ricardo
MRN: , DOB: Legal Sex: M
Adm: 10/17/2025, D/C: 11/14/2025

10/17/2025 - ED to Hosp-Admission (Discharged) in ARMC 4 North MICU (continued)

Clinical Notes (group 3 of 9) (continued)

#Traumatic SAH and SDH

#Cerebral Venous Thrombosis on Heparin gtt

#Respiratory Failure on MV 2/2 to altered mentation^[JM.2M]

Ricardo Vasquez is a 35 y.o. male^[JM.1T] with pmhx of schizophrenia and substance abuse is admitted to SICU with traumatic L SAH and SDH, R transverse sinus thrombosis, and R occipital skull fracture s/p e scooter v school bus collision. Internal Medicine is consulted for delirium tremens.^[JM.1M] Discussed with SICU, plan to avoid benzodiazepine gtt if possible so neuro exams can be done. Patient continues to be tachycardic and hypertensive on prop²⁵.

Recommendations

- Cont propofol
- Add precedex^[JM.2M], wean propofol before precedex^[JM.3M]
- phenobarbital 260mg x1
- Ativan Ciwa protocol^[JM.2M]
- Can continue scheduled librium^[JM.3M]
- MVI and Folate
- replete lytes
- IVF per primary
- Cont risperdal
- Consider psych consult if patient continues to have psychosis not explained by alcohol withdrawal
- Medicine to follow

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Thank you for allowing us to partake in the care of this patient. Please don't hesitate to contact with any questions.

Discussed with Dr. Yaopruke.^[JM.2M]

Date:10/19/2025

Time:5:56 PM

Provider:^[JM.1T]

Jelena B. Makar, MD MS

Internal Medicine | PGY-3

Arrowhead Regional Medical Center

Secure Chat Preferred^[JM.2T]

Linked Consult Order:^[JM.1T] **Inpatient consult to Internal Medicine:**^[JM.2M]

Consult performed by:^[JM.1T] Makar, Jelena, MD^[JM.2M]

Consult ordered by:^[JM.1T] Burbank, Ruben, MD^[JM.2M]

ORIGIN ID: CIBA (310) 477-1700
PANISH SHEA RAVIPUDI LLP
PANISH SHEA RAVIPUDI LLP
11111 SANTA MONICA BLVD
STE. 700
LOS ANGELES, CA 90025
UNITED STATES US

SHIP DATE: 07APR26
ACTWGT: 1.00 LB
CAD: 255524637/INET4535

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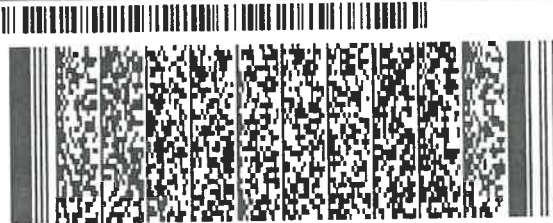
150 S. PALM AVE.

RIALTO CA 92376

(909) 820-2525
INV:
PO:

REF: 26021053479

DEPT:



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Express
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CITY OF RIALTO

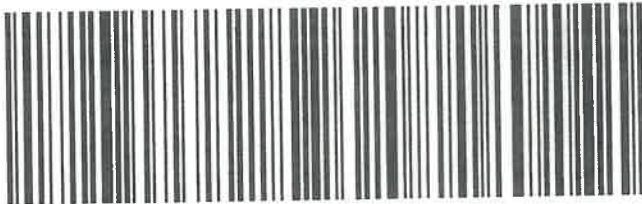
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