BOARD OF SUPERVISORS OF CONTRA COSTA COUNTY
INSTRUCTIONS TO CLAIMANT

A. A claim relating to a cause of action for death or for injury to person or to personal property or growing crops shall be presented not later than six months after the accrual of the cause of action. A claim relating to any other cause of action shall be presented not later than one year after the accrual of the cause of action.
(Gov. Code § 911.2.)

B. Claims must be filed with the Clerk of the Board of Supervisors at its office located at: County Administration Building, 1025 Escobar Street, 1st Floor, Martinez, CA 94553.

C. If claim is against a district governed by the Board of Supervisors, rather than the County, the name of the District should be filed in.

D. If the claim is against more than one public entity, separate claims must be filed against each public entity.

E. Fraud- See penalty or fraudulent claims, Penal Code Sec. 72 at the end of this form.

RE: Claim By:

[redacted]

Against the County of Contra Costa or

District)

(Fill in the name)

Reserved for Clerk's filing stamp

RECEIVED
NOV 16 2026
CLERK BOARD OF SUPERVISORS
CONTRA COSTA CO.

The undersigned claimant hereby makes claim against the County of Contra Costa or the above-named district in the sum of $ excess of 100,000.00 and in support of the claim represents as follows:

1. When did the damage or injury occur? (Give exact date and hour)

See attached addendum - approximately May, 2025, through July 17, 2026

2. Where did the damage or injury occur? (Include city and county)

John A. Davis Juvenile Hall 50 Douglas Dr., #200, Martinez, CA 94553

3. How did the damage or injury occur? (Give full details; use extra paper if required)

See attached addendum - sexual harassment and sexual abuse by County employee of a County ward

4. What particular act or omission on the part of county or district officers, servants or employees caused the damage or injury?

See attached.

5. What are the names of county or district officers, servants or employees causing the damage or injury?

See attached - Sofia Ann Buitron Drotts, Contra Costa County Probation, Contra Costa Health, etc.

6. What damage or injuries do you claim resulted? (Give full extent of injuries or damages claimed. Attach two estimates for auto damage.)

See attached.

7. How was the amount claimed above computed? (Include the estimated amount of any prospective damage or injury.)

See attached.

8. Names and addresses of witnesses, doctors and hospitals:

See attached. The extent of witnesses is currently not yet known to Claimant or Counsel.

9. List the expenditures you made on account of the accident or injury: See attached.

DATE	TIME	AMOUNT

SEND NOTICES TO: (Attorney)
Name and address of Attorney

John L. Burris, Esq.
Katherine A. MacElhiney, Esq.
John Burris, Nisenbaum & Curry LLP
7677 Oakport Street, Suite 1120
Oakland, CA 94621

Telephone No. 510-839-5200

) Gov. Code Sec. 910.2 provides "The claim shall be signed by the claimant or by some person on his behalf.)

Katherine MacElhiney
(Claimant's Signature)

John Burris, Nisenbaum & Curry, LLP
(Address)

7677 Oakport Street, Suite 1120 Oakland, CA 94621

Telephone No. 510-839-5200

PUBLIC RECORDS NOTICE:

Please be advised that this claim form, or any claim filed with the County under the Tort Claims Act is subject to public disclosure under the California Public Records Act. (Gov. Code §§ 6500 et seq.) Furthermore, any attachments, addendums, or supplements attached to the claim form, including medical records, are also subject to public disclosure.

NOTICE:

Section 72 of the Penal Code provides:

Every person who, with intent to defraud, presents for allowance or for payment to any state board or officer, or to any county, city or district board or officer, authorized to allow or pay the same if genuine, any false or fraudulent claim, bill, account voucher, or writing, is punishable either by imprisonment in the County jail for a period of not more than one year, by a fine of not exceeding one thousand dollars ($1000.00), or by both such imprisonment and fine, or by imprisonment in the state prison, by a fine of not exceeding ten thousand dollars ($10,000.000, or by both such imprisonment and fine.

BNC | JOHN BURRIS, NISENBAUM & CURRY — ATTORNEYS AT LAW —

7677 Oakport Street, Suite 1120
Oakland, CA 94621
Office: (510) 839-5200
Fax: (844) 273-6873

November 16, 2026

VIA PERSONAL SERVICE

Clerk of the Board of Supervisors of Contra Costa County
County Administration Building
1025 Escobar Street, 1st Floor
Martinez, California 94553

Re: Representation of [redacted] – GOVERNMENT TORT CLAIM

To the Clerk of the Board of Supervisors of Contra Costa County:

This is to inform you that John Burris, Nisenbaum & Curry, LLP., represents Samir Cruz Paz. My client is, and at relevant times was, a ward of the County of Contra Costa and was a minor under the age of eighteen for a good portion of the events described herein. From approximately May of 2025 through July of 2026, my client – who was for some of that time a minor – was sexually abused by Sofia Ann-Buitron Drotts, a Behavioral Health Clinician employed by Contra Costa County, and this was known and/or should have reasonably been discovered by currently unidentified agents, officers, and employees of Contra Costa County. In summary, my understanding of the abuse is as follows:

In May, 2025, Contra Costa County Health and/or Contra Costa County Probation assigned Sofia Ann Buitron-Drotts to provide behavioral therapy services to my client. My client was required to be alone with Ms. Drotts in a private room in the John A. Davis Juvenile Hall, unsupervised, as part of court-ordered therapy, from once to twice a week until approximately July 17, 2026, during which Ms. Drotts sexually harassed and abused my client.

Within the first few weeks Ms. Drotts began to make sexual comments including but not limited to telling my client, a minor, that she "gets wet" thinking of him, complimenting his physical features, telling him she wanted to "fuck him," and encouraging him to be transferred to a lower-security facility so that she could show him [by having sex with him] that her feelings for him were "for real."

Beginning in approximately late July to August of 2025, Ms. Drotts escalated the abuse into unlawful, physical, sexual contact with my client, including but not limited to: kissing, groping his penis, massaging his arms and shoulders, and rubbing her legs against his body. The physical abuse occurred in an unsupervised therapy room in the John A. Davis Juvenile Hall during my client's twice-weekly "therapy" sessions with Ms. Drotts, lasting for approximately forty-three to fifty-one weeks.

During that time, Ms. Drotts also unlawfully brought contraband cannabis "edibles" into the Juvenile Hall facility and gave them to my client, advising him as his "therapist" that the cannabis was as good for his mental wellness as any prescribed medication, in flagrant

violation of the laws and ethical codes governing her profession. Ms. Drotts also used the fact that my client accepted her contraband in order to coerce my client into concealing her misconduct and to coerce and prevent him under duress from seeking help. Drotts told my client on several occasions that if he ever told someone about their "relationship,' then he would have to submit to a drug test he would fail and that Probation / Juvenile Hall officers and staff would find the cannabis edibles, so that he would be subjected to carceral punishment ruining his hard work towards rehabilitation and freedom.

Additionally, Ms. Drotts provided my client with her cell phone number and told him to add her to his approved numbers and to call her outside of their therapy hours. Ms. Drotts and my client spoke frequently on the phone – we are currently aware of the existence of at least sixty-four (64) phone calls in law enforcement possession that show the ongoing sexual harassment of my client inside the John A. Davis Juvenile Hall by Ms. Drotts. This was known to or should have been known to County employees, who looked the other way and/or concealed the abuse. Ms. Drotts herself would punish my client with silent treatment and verbal abuse during their "therapy" sessions when he did not call her frequently and/or whenever she demanded him to.

In approximately June, 2026, my client requested to speak to another therapist instead of Ms. Drotts, but The Contra Costa Probation Department only assigned my client one "emergency" session with another Contra Costa Behavioral Health therapist, in which my client disclosed information about his inappropriate "relationship" with Ms. Drotts. Upon information and belief this alternate therapist, who is a mandated reporter, did not report the abuse but instead told Ms. Drotts about the disclosure and helped to conceal the abuse. My client was subsequently made to continue with his originally scheduled bi-weekly sessions with Ms. Drotts, who "punished" my client with verbal abuse because of the disclosure.

Despite being put on notice by my client of the ongoing abuse by Ms. Drotts, nothing was done by Contra Costa County Health or Probation staff to prevent future abuse or hold Ms. Drotts accountable. Ms. Drotts was allowed to continue her unsupervised, 1:1 access to my client, in a private clinical setting in the Juvenile Hall, where she continued to mentally and physically abuse my client until she was ultimately arrested on approximately July 17, 2026, for similar charges of sexual harassment and abuse of a similarly-situated juvenile ward of Contra Costa County and its subsidiary agencies and employees.

Each employee, officer, agent, and/or supervisor employed by Contra Cota County who came into contact with my client and/or Sofia Drotts, woefully failed to notice the abuse and/or ignored and/or concealed the abuse when they were or should have reasonably been on notice of it. We are aware that at least sixty-four recordings of the calls between my client and Sofia Drotts are currently in the possession of Contra Costa Probation and the Concord Police Department related to my client's July 31, 2026, report and victim statement. We are also aware that the County has returned an official disposition to my client saying that his statements about sexual harassment were "substantiated" but also refused to find that the allegations of physical abuse were likewise substantiated. Despite substantiating at least the

allegations of sexual harassment of my client by Sofia Drotts, as of today (November 16, 2026) no Contra Costa County law enforcement agency or court has filed any criminal charges against Ms. Drotts relating to the abuse my client endured.

The egregious nature of my client's allegations against Ms. Drotts, and the County's attempts to minimize and conceal the extent of the harms she caused him, a major portion of which occurring while he was a minor, raise serious questions about the sufficiency of the County's hiring, training, supervision, custodial, and safety protocols involving prisoners inside the John A. Davis Juvenile Hall and/or wards of the County. Contra Costa County, through its employees and employees of its subsidiary agencies, breached its duty to protect my client and others similarly situated. As a result, my client was sexually harassed and abused by Ms. Drotts for approximately fifteen months, during which he could not refuse her advances, rely on another adult or supervisor to notice the abuse, or escape.

The County failed to allocate the resources, staff, and management controls necessary to protect my client and other similarly situated juvenile wards from sexual abuse. The County negligently hired and failed to supervise Drotts, and/or knowingly or negligently failed to prevent the mental and sexual abuse of multiple minors to whom she was assigned in a privileged role. The County furthermore failed to implement and enforce supervision and safety protocols and/or procedural safeguards to investigate red flags regarding the therapist-client relationship, and/or to file legally mandated reports about the suspected and/or reported abuse and client-therapist misconduct.

From May, 2025 until approximately July 17, 2026, my client was locked inside John A. Davis Juvenile Hall with an adult sexual predator and undergo abusive and coercive "therapy" by a professional who had spent her education and career focusing on juvenile and carceral psychology clearly in order to position herself so that she could access abuse my client and other children for purposes of her own sexual gratification. As a result, my client and individuals similarly situated, suffered past, present, and future physical, emotional, and/or financial injury and/or hardship, for which the County is liable.

Your urgent attention to this matter is requested. Enclosures follow.

Respectfully,

/s/ Katherine A. MacElhiney, Esq.
Katherine A. MacElhiney, Esq.
John L. Burris, Esq.
Attorneys for Claimant, [redacted]

ADDENDUM – CALIFORNIA / GOVERNMENT TORT CLAIM

Claimants object to your Claim Form because it requires information which constitutes an invasion of the Claimants' privacy. Moreover, the information is not required to be provided by the Claimant under California Government Code Section 910. For example, California Government Code Section 910 does not require that the Claimant provide their home and work numbers, driver's license number, date of birth, auto insurance name and policy number, a diagram of the location of the incident, any statements by the Claimant as to their reasons "for believing the Respondent is liable for your damages, "or a description" of all damages which you believe you have incurred as a result of the incident." For the purposes of this document "CLAIMANT" means the individual claimants, claimants plural, and all plaintiffs and parties in interest represented by JOHN BURRIS, NISENBAUM, & CURRY, LLP. Therefore, Claimant submit the following information in support of his Claim pursuant to Government Code Section 910, et seq.:

CLAIMANTS' NAME: [redacted]

ADDRESS TO WHICH ALL NOTICES ARE TO BE SENT:
Katherine MacElhiney, Esq.
John Burris, Nisenbaum & Curry, LLP
7677 Oakport Street, Suite 1120
Oakland, CA 94621

CLAIMANTS' TELEPHONE NUMBER: (510) 839-5200

DATE AND TIME OF INCIDENT: Approximately May, 2025, through present.

INVOLVED AGENCIES: Contra Costa County; The State of California; County and State subsidiaries including but not limited to: Contra Costa County; Contra Costa Health; Contra Costa County Juvenile Detention; Contra Costa County Probation Department; Contra Costa County Juvenile Probation Department; Contra Costa County Behavioral Services; John Davis Juvenile Detention Center; California Youth Authority ("CYA"); Seneca Healthcare; and Seneca Health.

LOCATION OF INCIDENT:
John A. Davis Juvenile Hall
50 Douglas Dr., #200, Martinez, CA 94553

THE FOLLOWING PROVIDES A GENERAL DESCRIPTION OF THE INDEBTEDNESS, OBLIGATION, INJURY, DAMAGES OR LOSS INCURRED SO FAR AS IT MAY BE KNOWN AT THE TIME OF PRESENTATION OF THE CLAIM" AND "THE NAME OR NAMES OF THE PUBLIC EMPLOYEE OR EMPLOYEES CAUSING THE INJURY, DAMAGES, OR LOSS, IF KNOWN: [Per Government Code Section 910]. For the purposes of this claim, "AGENCY" is defined by and refers to the municipal, county, or state entity, which governs Office of Risk and Insurance Management.

DESCRIPTION OF INCIDENT:

In May, 2025, Contra Costa County Health and/or Contra Costa County Probation assigned Sofia Ann Buitron-Drotts to provide behavioral therapy services to my client. My client was required to be alone with Ms. Drotts in a private room in the John A. Davis Juvenile Hall, unsupervised, as part of court-ordered therapy, from once to twice a week until approximately July 17, 2026, during which Ms. Drotts sexually harassed and abused my client.

Within the first few weeks Ms. Drotts began to make sexual comments including but not limited to telling my client, a minor, that she "gets wet" thinking of him, complimenting his physical features, telling him she wanted to "fuck him," and encouraging him to be transferred to a lower-security facility so that she could show him [by having sex with him] that her feelings for him were "for real."

Beginning in approximately late July to August of 2025, Ms. Drotts escalated the abuse into unlawful, physical, sexual contact with my client, including but not limited to: kissing, groping his penis, massaging his arms and shoulders, and rubbing her legs against his body. The physical abuse occurred in an unsupervised therapy room in the John A. Davis Juvenile Hall during my client's twice-weekly "therapy" sessions with Ms. Drotts, lasting for approximately forty-three to fifty-one weeks.

During that time, Ms. Drotts also unlawfully brought contraband cannabis "edibles" into the Juvenile Hall facility and gave them to my client, advising him as his "therapist" that the cannabis was as good for his mental wellness as any prescribed medication, in flagrant violation of the laws and ethical codes governing her profession. Ms. Drotts also used the fact that my client accepted her contraband in order to coerce my client into concealing her misconduct and to coerce and prevent him under duress from seeking help. Drotts told my client on several occasions that if he ever told someone about their "relationship,' then he would have to submit to a drug test he would fail and that Probation / Juvenile Hall officers and staff would find the cannabis edibles, so that he would be subjected to carceral punishment ruining his hard work towards rehabilitation and freedom.

Additionally, Ms. Drotts provided my client with her cell phone number and told him to add her to his approved numbers and to call her outside of their therapy hours. Ms. Drotts and my client spoke frequently on the phone – we are currently aware of the existence of at least sixty-four (64) phone calls in law enforcement possession that show the ongoing sexual harassment of my client inside the John A. Davis Juvenile Hall by Ms. Drotts. This was known to or should have been known to County employees, who looked the other way and/or concealed the abuse. Ms. Drotts herself would punish my client with silent treatment and verbal abuse during their "therapy" sessions when he did not call her frequently and/or whenever she demanded him to.

In approximately June, 2026, my client requested to speak to another therapist instead of Ms. Drotts, but The Contra Costa Probation Department only assigned my client one "emergency" session with another Contra Costa Behavioral Health therapist, in which my

client disclosed information about his inappropriate "relationship" with Ms. Drotts. Upon information and belief this alternate therapist, who is a mandated reporter, did not report the abuse but instead told Ms. Drotts about the disclosure and helped to conceal the abuse. My client was subsequently made to continue with his originally scheduled bi-weekly sessions with Ms. Drotts, who "punished" my client with verbal abuse because of the disclosure.

Despite being put on notice by my client of the ongoing abuse by Ms. Drotts, nothing was done by Contra Costa County Health or Probation staff to prevent future abuse or hold Ms. Drotts accountable. Ms. Drotts was allowed to continue her unsupervised, 1:1 access to my client, in a private clinical setting in the Juvenile Hall, where she continued to mentally and physically abuse my client until she was ultimately arrested on approximately July 17, 2026, for similar charges of sexual harassment and abuse of a similarly-situated juvenile ward of Contra Costa County and its subsidiary agencies and employees.

Each employee, officer, agent, and/or supervisor employed by Contra Cota County who came into contact with my client and/or Sofia Drotts, woefully failed to notice the abuse and/or ignored and/or concealed the abuse when they were or should have reasonably been on notice of it. We are aware that at least sixty-four recordings of the calls between my client and Sofia Drotts are currently in the possession of Contra Costa Probation and the Concord Police Department related to my client's July 31, 2026, report and victim statement. We are also aware that the County has returned an official disposition to my client saying that his statements about sexual harassment were "substantiated" but also refused to find that the allegations of physical abuse were likewise substantiated. Despite substantiating at least the allegations of sexual harassment of my client by Sofia Drotts, as of today (November 16, 2026) no Contra Costa County law enforcement agency or court has filed any criminal charges against Ms. Drotts relating to the abuse my client endured.

The egregious nature of my client's allegations against Ms. Drotts, and the County's attempts to minimize and conceal the extent of the harms she caused him, a major portion of which occurring while he was a minor, raise serious questions about the sufficiency of the County's hiring, training, supervision, custodial, and safety protocols involving prisoners inside the John A. Davis Juvenile Hall and/or wards of the County. Contra Costa County, through its employees and employees of its subsidiary agencies, breached its duty to protect my client and others similarly situated. As a result, my client was sexually harassed and abused by Ms. Drotts for approximately fifteen months, during which he could not refuse her advances, rely on another adult or supervisor to notice the abuse, or escape.

The County failed to allocate the resources, staff, and management controls necessary to protect my client and other similarly situated juvenile wards from sexual abuse. The County negligently hired and failed to supervise Drotts, and/or knowingly or negligently failed to prevent the mental and sexual abuse of multiple minors to whom she was assigned in a privileged role. The County furthermore failed to implement and enforce supervision and safety protocols and/or procedural safeguards to investigate red flags regarding the therapist-

client relationship, and/or to file legally mandated reports about the suspected and/or reported abuse and client-therapist misconduct.

From May, 2025 until approximately July 17, 2026, my client was locked inside John A. Davis Juvenile Hall with an adult sexual predator and undergo abusive and coercive "therapy" by a professional who had spent her education and career focusing on juvenile and carceral psychology clearly in order to position herself so that she could access abuse my client and other children for purposes of her own sexual gratification. As a result, my client and individuals similarly situated, suffered past, present, and future physical, emotional, and/or financial injury and/or hardship, for which the County is liable.

DESCRIPTION OF CLAIM:

Claimant alleges that the conduct of individual employees, agents, and/or servants of AGENCY constitute violations of Federal law, Civil Rights and Constitutional Rights, Americans With Disabilities Act, and California State statutory violations, which might include but are not limited to rape, sexual assault and battery, assault and battery, false imprisonment, harassment, solicitation of child pornography, negligence, and intentional and/or negligent infliction of emotional distress.

Claimant alleges those individual employees, agents and/or servants of CONTRA COSTA COUNTY and/or the State of California are responsible for Claimant's injuries, and acts and/or omissions committed within the course or scope of employment under the theory of *respondeat superior*. *Respondeat superior* liability includes but is not limited to, negligent training, supervision, control and/or discipline. Individual employees, agents, and/or servants of the AGENCY, include but are not limited to, Sofia Ann Buitron Drotts, the chief of police, sheriff, or an individual of comparable title, in charge of law enforcement for CONTRA COSTA COUNTY and its subsidiary agencies named herein, and DOES 1-100, and/or each of them, individually and/or while acting in concert with one another.

Claimant further alleges the *non-exhaustive* appropriate offenses listed below:

- Rape;
- Statutory Rape;
- Unlawful sexual contact with a Minor;
- Solicitation and/or transmission of Child Pornography;
- Lewd Acts with a Minor;
- Voyeurism;
- Assault;
- Battery;
- Professional and/or Medical Assault and Battery;
- Harassment;
- Stalking;
- False Imprisonment;
- Violations of the First, Fourth, Eighth, and Fourteenth Amendments of the U.S. Constitution;
- Violations of 42 USC § 1983, 1985-6, and 1988;
- Violations of California Civil Code Sections §§ 51.7, 52.1;

- Violations of the Prison Rape Elimination Act and corresponding Penal, Civil, and Government Codes;
- Breach of Fiduciary Duty;
- Failure to prevent sexual abuse;
- Failure to protect;
- Cruel and unusual punishment;
- Unsafe conditions of confinement;
- Negligence;
- Professional Negligence;
- Medical Negligence;
- Negligent Hiring
- Negligent Supervision
- Negligent Retention
- Negligent Infliction of Emotional Distress;
- Failure to Investigate;
- Failure to Report;
- Violations of rules of professional ethics, conduct, and corresponding state and federal statutes governing the professions of psychology, counseling, mental healthcare, rehabilitative care, and/or the fields of probationary and custodial care of minors, and detention facility operations;
- Conspiracy;
- Fraud;
- Concealment;
- Harassment;
- Coercion;
- Infliction of Emotional Distress (intentional and/or negligent);
- Defamation;
- Destruction of Evidence;
- Premises Liability;
- Vicarious Liability.

DESCRIBE INJURY OR DAMAGE:

My client, and individuals similarly situated, have suffered the injuries described herein, and violation of due process of law and of federal and state statutory and constitutional rights; And are entitled to recover damages according to proof, including exemplary damages.

As a result of being subjected to unchecked, unsupervised abuse by his County appointed, court-mandated therapist, my client now suffers depression, anxiety, panic attacks, and nightmares. He expresses no hope for relief from his injuries due to the extreme dereliction of his confidence in the psychological profession caused by Drotts and by the County's abject failure to protect my client and other juvenile wards from abuse by a County-appointed therapist, while they were prisoners. My client and individuals similarly situated, have suffered sexual assault and battery, statutory rape, sexual and physical abuse, harassment, physical, mental, and emotional distress, invasion of privacy, and violations of due process of law and federal and state statutory and constitutional rights, and attempts to defame and defraud and

conceal evidence; For which my client and others similarly situated are entitled to recover damages according to proof, including punitive and exemplary damages.

NAME OF PUBLIC EMPLOYEE(S) BELIEVED TO HAVE CAUSED INJURY OR DAMAGE: SOFIA ANN-BUITRON DROTTS.

Claimants are unaware of the names and identities of every agent, corrections officer, porter, medical personnel, staff, and/or employee of Respondent CONTRA COSTA COUNTY and its subsidiary agencies and employees, officers, and agents involved in the ongoing violations of our client's rights.

DEMAND FOR PRESERVATION OF EVIDENCE:

Claimant does hereby demand that CONTRA COSTA COUNTY including, but not limited to, the appropriate city or county law enforcement agency, its employees, servants and/or attorneys, maintain and preserve all evidence, documents and tangible materials which relate in any manner whatsoever to the subject matter of this Claim, including until the completion of any and all civil and/or criminal litigation arising from the events which are the subject matter of this Claim. This demand for preservation of evidence includes, but is not limited to, a demand that all public safety entities preserve all tapes, logs and/or other tangible materials of any kind until the completion of any and all civil and criminal litigation arising from the subject matter of this claim.

AMOUNT OF CLAIM:

This claim exceeds $ 100,000.00. Jurisdiction is designated as "unlimited" and jurisdiction would be in the Superior Court of the State of California.

Very truly yours,

DATED: November 16, 2026

/s/ Katherine A. MacElhiney, Esq.
Katherine A. MacElhiney,
John L. Burris,
Attorneys for [redacted]