

DATE SUBMITTED 11/21/2025  
 SUBMITTED BY Human Resources  
 DATE ACTION REQUIRED 12/03/2025

COUNCIL ACTION (X)  
 PUBLIC HEARING REQUIRED ( )  
 RESOLUTION ( )  
 ORDINANCE 1<sup>ST</sup> READING ( )  
 ORDINANCE 2<sup>ND</sup> READING ( )  
 CITY CLERK'S INITIALS ( )

**IMPERIAL CITY COUNCIL  
 AGENDA ITEM**

SUBJECT: DISCUSSION/ACTION: 1. Authorization to reject claim CJP-3055403 as recommended by Carl Warren & Company.	
DEPARTMENT INVOLVED: Human Resources	
BACKGROUND/SUMMARY: Recommendation from Carl Warren & Company to reject claim CW File Number CJP-3055403 submitted by Raymond Ghermezian, Esq., on behalf of Guadalupe Guzman on November 20, 2025.	
FISCAL IMPACT: NOT TO EXCEED There is no fiscal impact associated with this action.	FINANCE INITIALS <u>JMS</u>
STAFF RECOMMENDATION: Recommendation to approved authorization of claim rejection.	DEPT. INITIALS <u>KWS</u>
MANAGER'S RECOMMENDATION: Approve Staff Recommendation	CITY MANAGER'S INITIALS <u>JHM</u>
MOTION:	
SECONDED: AYES: NAYES: ABSENT:	APPROVED ( )      REJECTED ( ) DISAPPROVED ( )      DEFERRED ( ) REFERRED TO:



**CARL WARREN & COMPANY**  
Claims Management and Solutions

A  **VENBROOK** Company

November 21, 2025

TO: City of Imperial

ATTENTION: Kristen Smith

RE: Claim	:	Guzman vs. Imperial
Claimant	:	Guadalupe Guzman
Member	:	City of Imperial
Date Rec'd by Mbr	:	11/20/25
Date of Event	:	9/5/25
CW File Number	:	CJP-3055403 SCV

Please allow this correspondence to acknowledge receipt of the captioned claim. Please take the following action:

- **CLAIM REJECTION: Send a standard rejection letter to the claimant.**

Please include a Proof of Mailing with your rejection notice to the claimant. An exemplar copy of a Proof of Mailing is attached. Please provide us with a copy of the Notice of Rejection and copy of the Proof of Mailing. If you have any questions feel free to contact the assigned adjuster or the undersigned claims specialist.

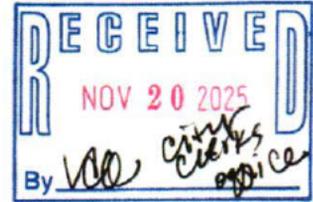
Very Truly Yours,

CARL WARREN & CO.

*Timothy M. Varon*

Timothy M. Varon  
Claims Supervisor

November 18, 2025  
**CLAIM FOR DAMAGES**  
(Government Code §911.2)



TO: CITY OF IMPERIAL

CITY OF IMPERIAL  
City Clerk  
420 So. Imperial Avenue  
Imperial, CA 92251

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

RE: Claimant: Guadalupe Guzman  
Date of Accident: September 5, 2025

**Name of Claimant(s):** Guadalupe Guzman

**Mailing Address and Telephone Number of Claimant:**

[REDACTED]

**Age of Claimant:** [REDACTED]

**Give Address to Which You Desire Notices or Communications to be Sent regarding this Claim:** c/o LAW OFFICES OF RAYMOND GHERMEZIAN [REDACTED]

[REDACTED]

**How Did Damage or Injury Occur? Give full particulars:**

Claimant slipped and fell on the City owned and controlled driveway/apron/parkway located near adjacent to 308 E. State Street, El Centro, CA 92243. Claimant sustained injuries as a result of a dangerous condition on the subject City (Claimant slipped and fell on overflow of water due to rain and improper irrigation system and City failed to maintain grass on the subject driveway/apron/parkway) property. City of Imperial had actual and constructive notice. Claimant sustained severe injuries to his right ankle; right knee; right leg; lower back as a result of the dangerous condition on the subject City property. City of Imperial and its employees negligently and recklessly designed, maintained and operated the subject driveway/apron/parkway so as to cause the claimant's injuries. City of Imperial negligently, carelessly, and recklessly failed to maintain, own, supervise, and inspect its driveway/apron/parkway by allowing the Plaintiff to safely walk in the driveway/apron/parkway. City of Imperial negligently, carelessly, and recklessly failed to provide adequate warnings and signs to the public. City of Imperial negligently, carelessly, and recklessly failed to adequately train, supervise, hire and screen its employees who operated the subject driveway/apron/parkway. Liability for City of Imperial .

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the Wrongful Act or Omissions by Public Entity Employees, Government Code Section 815.2 et seq. and Liability for Dangerous Condition of Public Property, Government Code Section 835. The City of Imperial failed to follow the proper procedures and guidelines with regard to keeping safe driveway/apron/parkway and following safe techniques resulting in a recklessness and negligent acts. The City of Imperial recklessly and negligently caused Claimant to sustain severe injuries. Claimant is still treating and the full extent of Claimants injuries are to be determined. Investigation and discovery ongoing, claimant reserves the right to amend/supplement this claim form.

Name of Agency against which this claim is filed?

City of Imperial

When Did Damage or Injury Occur? Give full particulars; date, time of day:

Spetember 05, 2025 @ approx 2:00 p.m.

Where Did Damage or Injury Occur? Describe fully.:

Claimant slipped and fell on the City owned and controlled driveway/apron/parkway located near adjacent to 308 E. State Street, El Centro, CA 92243.

What Particular Act or Omission Do You Claim Caused the Injury or Damage? Give Names of employees causing the injury or Damage, if known:

Claimant slipped and fell on the City owned and controlled driveway/apron/parkway located near adjacent to 308 E. State Street, El Centro, CA 92243. Claimant sustained injuries as a result of a dangerous condition on the subject City (Claimant slipped and fell on overflow of water due to rain and improper irrigation system and City failed to maintain grass on the subject driveway/apron/parkway) property. City of Imperial had actual and constructive notice. Claimant sustained severe injuries to his right ankle; right knee; right leg; lower back as a result of the dangerous condition on the subject City property. City of Imperial and its employees negligently and recklessly designed, maintained and operated the subject driveway/apron/parkway so as to cause the claimant's injuries. City of Imperial negligently, carelessly, and recklessly failed to maintain, own, supervise, and inspect its driveway/apron/parkway by allowing the Plaintiff to safely walk in the driveway/apron/parkway. City of Imperial negligently, carelessly, and recklessly failed to provide adequate warnings and signs to the public. City of Imperial negligently, carelessly, and recklessly failed to adequately train, supervise, hire and screen its employees who operated the subject driveway/apron/parkway. Liability for the Wrongful Act or Omissions by Public Entity Employees, Government Code Section 815.2 et seq. and Liability for Dangerous Condition of Public Property, Government Code Section 835. The City of Imperial failed to follow the proper procedures and guidelines with regard to keeping safe driveway/apron/parkway and following safe techniques resulting in a recklessness and negligent acts. The City of Imperial recklessly and negligently caused Claimant to sustain severe injuries. Claimant is still treating and the full extent of Claimants injuries are to be determined. Investigation and discovery ongoing, claimant reserves the right to amend/supplement this claim form.

What amount do you claim on account of each item of injury or damage as of date of presentation of this claim, giving basis of computation: Within the jurisdiction of the Superior Court. Believed to exceed \$1,000,000.

Names and Address of Witnesses, Doctors and Hospitals:

Unknown Employees of the City of Imperial whose names are unknown and other witnesses whose names are unknown at this time. Claimant's treating physicians including but not limited to physicians. Investigation and Discovery ongoing, Plaintiff reserves the right to amend and/or supplement this claim form.

DATED: November 18, 2025

  
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Raymond Ghermezian, Esq.  
On Behalf of Claimant