

1 Christopher B. Adamson, Esq. (State Bar No. 238500)
Alan A. Ahdoot, Esq. (State Bar No. 238594)
2 Peter M. Williamson, Esq. (State Bar No. 97309)
3 **ADAMSON AHDOOT LLP**
1150 South Robertson Blvd.,
Los Angeles, California 90035
4 Telephone: (310) 888-0024
Facsimile: (888) 895-4665

FILED SAJ
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

NOV 19 2020

L. VILLANUEVA

NOV 30 2020

5 Attorneys for Plaintiffs
6 **MIKE ANGEL NAVARRO & CYNTHIA SALCIDO**
individually, and as successors in interest to **CRISTIAN**
7 **ANGEL NAVARRO**, deceased

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF RIVERSIDE – HISTORIC COURTHOUSE**
10 **UNLIMITED JURISDICTION**

12 MIKE ANGEL NAVARRO and CYNTHIA)
SALCIDO, individually, and as successors)
13 in interest to CRISTIAN ANGEL NAVARRO,)
deceased;

CASE NO.: CVR1 2000182

14)
15 Plaintiff,

COMPLAINT FOR DAMAGES FOR:

16 v.

- 1. NEGLIGENCE – WRONGFUL DEATH
- 2. NEGLIGENCE – SURVIVAL ACTION

17 JURUPA UNIFIED SCHOOL DISTRICT,)
a Public Entity; CHRISTOPHER)
18 FOWLER, an individual, and DOES 1)
through 100, inclusive,)

BY FAX

[DEMAND FOR TRIAL BY JURY]

19)
20 Defendants.

DEMAND IS ABOVE \$25,000.00

21 _____)
22 **COMES NOW** Plaintiffs, MIKE ANGEL NAVARRO and CYNTHIA SALCIDO, individually,
23 and as successors in interest to CRISTIAN ANGEL NAVARRO, deceased, who allege as follows:

24 **PARTIES**

25 1. At the time of the incident hereinafter alleged, Plaintiff, MIKE ANGEL NAVARRO, was
26 the father of Decedent, CRISTIAN ANGEL NAVARRO.

27 2. At the time of the incident hereinafter alleged, Plaintiff, CYNTHIA SALCIDO, was the
28 mother of Decedent, CRISTIAN ANGEL NAVARRO.

1 3. The true names and/or capacities, whether individual, corporate, associate or otherwise,
2 of Defendants DOES 1 through 100, inclusive, and each of them, are unknown to Plaintiffs, who
3 therefore sue said Defendants by such fictitious names pursuant to *California Code of Civil Procedure*
4 § 474. Plaintiffs are informed and believe, and upon such information and belief allege, that each of the
5 Defendants fictitiously named herein as a DOE is legally responsible, negligently or in some other
6 actionable manner, for the events and happenings hereinafter referenced to, and proximately caused the
7 damages to Plaintiffs hereinafter alleged. Plaintiffs will seek leave of court to amend this Complaint to
8 assert the true names and/or capacities of such fictitiously named Defendants when the same have been
9 ascertained.

10 4. Plaintiffs are informed and believe, and thereon allege, that at all times relevant hereto
11 each of the Defendants, including without limitation the DOE Defendants, was the agent, affiliate,
12 officer, director, manager, principal, alter-ego and/or employee of the other Defendants and was at all
13 times acting within the scope of such agency, affiliation, alter-ego relationship and/or employment and
14 actively participated in, or subsequently ratified and adopted, or both, each and all of the acts or conduct
15 alleged herein, with full knowledge of all the facts and circumstances, including, but not limited to, full
16 knowledge of each and all of the violations of Plaintiffs' rights and the damages to Plaintiffs proximately
17 caused thereby.

18 5. At the time of the incident hereinafter alleged, Patriot High School was a school in
19 Defendant, JURUPA UNIFIED SCHOOL DISTRICT.

20 6. At the time of the incident hereinafter alleged, Defendant, JURUPA UNIFIED SCHOOL
21 DISTRICT, was a government entity conducting operations in the City of Jurupa Valley and County of
22 Riverside, California.

23 7. At the time and place of the incident hereinafter alleged, Plaintiffs are informed, believe
24 and thereon allege that Defendants, DOES 1 through 50, inclusive, were employees and/or agents of
25 Defendant, JURUPA UNIFIED SCHOOL DISTRICT, and/or Defendants DOES 1 through 50, inclusive,
26 and were acting within the course and scope of their employment and/or agency statuses.

27 8. At the time and place of the incident hereinafter alleged, Plaintiffs are informed, believe
28 and thereon allege that Defendant, CHRISTOPHER FOWLER, was the Athletic Director, as well as

1 the Head Football Coach, at Patriot High School.

2 9. At the time and place of the incident hereinafter alleged, Plaintiffs are informed, believe
3 and thereon allege that Defendants DOES 51 through 100 were agents, coaches and/or instructors of the
4 Patriot High School football team, Defendant, JURUPA UNIFIED SCHOOL DISTRICT, and/or
5 Defendants, Does 51 through 100, and were acting within the course and scope of their agency,
6 employment and/or retention.

7 10. On or about October 21, 2020 prior to the filing of this Complaint, and pursuant to the
8 provisions of *Government Code* § 910, *et seq.*, Plaintiffs timely, properly, and duly submitted to
9 Defendant, JURUPA UNIFIED SCHOOL DISTRICT, a claim for the injuries and damages set forth
10 herein on account of the events described herein. Plaintiffs' claim was rejected by Defendant, JURUPA
11 UNIFIED SCHOOL DISTRICT, on November 2, 2020.

12 **GENERAL ALLEGATIONS**

13 11. Prior to the time of the incident hereinafter alleged, Decedent, CRISTIAN ANGEL
14 NAVARRO, was a student at Patriot High School in the City of Jurupa Valley, California.

15 12. Prior to the time of the incident hereinafter alleged, Decedent, CRISTIAN ANGEL
16 NAVARRO, was a participant on the football team at Patriot High School.

17 13. Defendants, including but not limited to Defendant, CHRISTOPHER FOWLER, and
18 DOES 51 through 100, inclusive, were Decedent, CRISTIAN ANGEL NAVARRO's coaches, trainers,
19 and/or instructors on the Patriot High School football team.

20 14. At the time of incident hereinafter alleged, Defendants, and each them, were responsible
21 for the safety and well-being of the students of Patriot High School.

22 15. At the time of incident hereinafter alleged, Defendants were responsible for the safety and
23 well-being of the students of Patriot High School who participated on the school's football team.

24 16. On September 28, 2020, Decedent, CRISTIAN ANGEL NAVARRO, was participating
25 in the season's first practice of the Patriot High School football team.

26 17. On September 28, 2020, Defendants, and each of them, failed to adequately monitor the
27 students participating in the season's first practice of the Patriot High School football team, including
28 Decedent, CRISTIAN ANGEL NAVARRO, with respect to the potential risk for dehydration and

1 Exertional Heat Stroke due to the physical exertion of the students combined with extremely hot
2 temperatures on that day.

3 18. On September 28, 2020, Decedent, CRISTIAN ANGEL NAVARRO, exhibited the signs
4 and symptoms of Exertional Heat Stroke, that he was dehydrated, and needed to cool off and rehydrate.

5 19. On September 28, 2020, Defendants, and each of them, failed to recognize the signs and
6 symptoms of Exertional Heat Stroke that Decedent, CRISTIAN ANGEL NAVARRO, was exhibiting.

7 20. On September 28, 2020, Defendants, and each of them, failed to provide the students
8 participating in the first practice of the Patriot High School football team, including Decedent,
9 CRISTIAN ANGEL NAVARRO, an opportunity to cool down and/or rehydrate their bodies.

10 21. On September 28, 2020, Defendants, and each of them, failed to provide the students
11 participating in the first practice of the Patriot High School football team, including Decedent,
12 CRISTIAN ANGEL NAVARRO, with adequate opportunities and resources, to rest, hydrate, and cool-
13 off during the season's first football practice.

14 22. At approximately 4:45 p.m., on September 28, 2020, the temperature in the City of Jurupa
15 Valley was approximately 104 degrees Fahrenheit.

16 23. At approximately 4:45 p.m., on September 28, 2020, Decedent, CRISTIAN ANGEL
17 NAVARRO, began to experience the signs and symptoms of Exertional Heat Stroke including
18 disorientation, imbalance, and cognitive problems, eventually collapsing during the Patriot High School
19 football practice as the result of dehydration and the effects thereof, following physical exertion in
20 extremely hot weather.

21 24. Decedent, CRISTIAN ANGEL NAVARRO, died on October 1, 2020, at approximately
22 11:00 a.m., from the injuries caused by Defendants' and each of their acts and/or omissions on
23 September 28, 2020.

24 **FIRST CAUSE OF ACTION**

25 **[Negligence – Wrongful Death]**

26 **(Against all Defendants)**

27 25. Plaintiffs repeat and reallege the allegations contained in Paragraphs 1 through 24,
28 hereinabove, and incorporate the same as though fully set forth herein.

1 26. Defendants, JURUPA UNIFIED SCHOOL DISTRICT, and DOES 1 through 50,
2 inclusive, and each of them, hired or otherwise retained the coaches and instructors of the Patriot High
3 School football team, including, but not limited to, Defendant, CHRISTOPHER FOWLER, and DOES
4 51 through 100, inclusive.

5 27. The coaches and instructors of the Patriot High School football team, including, but not
6 limited to, Defendant, CHRISTOPHER FOWLER, and DOES 51 through 100, inclusive, were unfit or
7 incompetent to perform the work for which they were hired or otherwise retained.

8 28. Defendants, JURUPA UNIFIED SCHOOL DISTRICT, and DOES 1 through 50,
9 inclusive, and each of them, knew or should have known, that the coaches and instructors of the Patriot
10 High School football team, including, but not limited to, Defendant, CHRISTOPHER FOWLER, and
11 DOES 51 through 100, inclusive, were unfit or incompetent and that this unfitness or incompetence
12 created a particular risk to students participating in the season's first practice of the Patriot High School
13 football team, including Decedent, CRISTIAN ANGEL NAVARRO.

14 29. Prior to, and at approximately 4:45 p.m. on September 28, 2020, Defendants, JURUPA
15 UNIFIED SCHOOL DISTRICT, and DOES 1 through 50, inclusive, and each of them, were negligent
16 in that they failed to ensure that those adults working directly with students at Patriot High School,
17 including, Decedent, CRISTIAN ANGEL NAVARRO, have the knowledge and ability to minimize risks
18 and reduce injuries for the students they serve.

19 30. In the days prior to, and at approximately 4:45 p.m. on September 28, 2020, Defendants,
20 and each of them, including Defendant, CHRISTOPHER FOWLER and the other coaches and
21 instructors of the Patriot High School football team, failed to appreciate the extremely high temperatures
22 that were prevalent in the City of Jurupa Valley by scheduling the season's football practice and
23 conditioning drills during the hottest part of the day (3pm–5pm), while failing to implement acclimation
24 guidelines for the season's first day of football practice to allow football players to slowly adjust to the
25 intensity of the practices, and failed to ensure that proper medical coverage was provided and that all
26 football coaches and instructors were familiar with Exertional Heat Stroke policies.

27 31. Prior to, and at approximately 4:45 p.m. on September 28, 2020, Defendants, and each
28 of them, including Defendant, CHRISTOPHER FOWLER and the other coaches and instructors of the

1 Patriot High School football team, failed to recognize the signs and symptoms of Exertional Heat Stroke
2 including, but not limited to: altered consciousness, disorientation or dizziness, headache, confusion or
3 a look of being “out of it”, nausea or vomiting, diarrhea, muscle cramps, loss of muscle function/balance,
4 inability to walk, collapse, staggering or sluggish feeling, profuse sweating, decreasing performance or
5 weakness, dehydration, dry mouth, thirst, rapid pulse, low blood pressure, rapid breathing, and irrational
6 behavior.

7 32. Prior to, and at approximately 4:45 p.m. on September 28, 2020, Defendants, and each
8 of them, including Defendant, CHRISTOPHER FOWLER and the other coaches and instructors of the
9 Patriot High School football team, were negligent in that they failed to implement an Emergency Action
10 Plan to respond to football players, such as Decedent, CRISTIAN ANGEL NAVARRO, who exhibited
11 the signs and symptoms of Exertional Heat Stroke.

12 33. Prior to, and at approximately 4:45 p.m. on September 28, 2020, Defendants, and each
13 of them, including Defendant, CHRISTOPHER FOWLER and the other coaches and instructors of the
14 Patriot High School football team, were negligent in that they failed to ensure proper body cooling
15 methods were available to the football players such as Decedent, CRISTIAN ANGEL NAVARRO,
16 including, but not limited to; a cold-water immersion tub, ice towels, access to water, ice, Temperature
17 (WBGT) Device, rectal thermometer, lubricating gel, and a tent for shade, and likewise ensure that this
18 equipment was prepared before the football practice on September 28, 2020 began.

19 34. Prior to, and at approximately 4:45 p.m. on September 28, 2020, Defendants, and each
20 of them, including Defendant, CHRISTOPHER FOWLER and the other coaches and instructors of the
21 Patriot High School football team, were negligent in that they failed to establish guidelines for football
22 players practicing in hot, humid weather including; requiring Wet Bulb Globe Temperature (WBGT)
23 readings and consideration of time of activity, intensity/duration, equipment issues, and rest/water
24 breaks.

25 35. At approximately 4:45 p.m. on September 28, 2020, Defendants, and each of them,
26 including Defendant, CHRISTOPHER FOWLER and the other coaches and instructors of the Patriot
27 High School football team were negligent in that they failed to initiate the emergency treatment of
28 Decedent, CRISTIAN ANGEL NAVARRO, who was exhibiting the signs and symptoms of Exertional

1 Heat Stroke.

2 36. The coaches and instructors of the Patriot High School football team, including but not
3 limited to Defendant, CHRISTOPHER FOWLER, and DOES 51 through 100, inclusive, harmed
4 Decedent, CRISTIAN ANGEL NAVARRO, and thus Plaintiffs.

5 37. Defendants, JURUPA UNIFIED SCHOOL DISTRICT, and DOES 1 through 50,
6 inclusive, and each of their negligence in hiring, retaining, supervising, educating, and failing to
7 adequately equip the coaches and instructors of the Patriot High School football team, including, but not
8 limited to, Defendant, CHRISTOPHER FOWLER, and DOES 51 through 100, inclusive, was a
9 substantial factor in causing Plaintiffs' harm.

10 38. Prior to, and at approximately 4:45 p.m. on September 28, 2020, Defendants engaged in
11 conduct that was so reckless that it was totally outside the range of the ordinary activity involved in high
12 school football.

13 39. The failure of Defendants, and each of them, to provide adequate opportunities and
14 resources to the students participating in the first practice of the Patriot High School football team,
15 including Decedent, CRISTIAN ANGEL NAVARRO, to rest, hydrate, and cool-off during the practice
16 was entirely outside the range of ordinary activity involved in high school football because providing
17 adequate opportunities and resources to rest, hydrate, and cool-off could have occurred without
18 discouraging vigorous participation or fundamentally changing the activity.

19 40. Decedent CRISTIAN ANGEL NAVARRO's dehydration and the effects thereof,
20 including but not limited to high body temperature and exhaustion, was entirely outside the range of
21 ordinary activity involved in high school football because it could have been prevented without
22 discouraging vigorous participation or otherwise fundamentally changing the activity of participating
23 in the activity.

24 41. Prior to, and at approximately 4:45 p.m. on September 28, 2020, Defendants, and each
25 of them, acted recklessly in that their conduct was entirely outside the range of ordinary activity involved
26 in teaching or coaching high school football in which Decedent, CRISTIAN ANGEL NAVARRO, was
27 participating on September 28, 2020.

28 //

1 42. Prior to, and at approximately 4:45 p.m. on September 28, 2020, Defendants, and each
2 of them, engaged in conduct totally outside the range of the ordinary activity involved in teaching or
3 coaching high school football.

4 43. Prior to, and at approximately 4 :45 p.m. on September 28, 2020, Defendants, and each
5 of their failure to use ordinary care increased the risk of injury to Decedent, CRISTIAN ANGEL
6 NAVARRO.

7 44. Prior to, and at approximately 4:45 p.m. on September 28, 2020, Defendants, and each
8 of them, unreasonably increased the risks to Decedent, CRISTIAN ANGEL NAVARRO, over and above
9 those inherent in high school football.

10 45. Prior to, and at approximately 4:45 p.m. on September 28, 2020, Defendants, and each
11 of them, negligently designed, operated, and/or facilitated the football practice at Patriot High School.

12 46. Prior to, and at approximately 5:04 p.m. on September 28, 2020, Defendants knew or
13 should have known that their failure to provide adequate opportunities and resources to the students
14 participating in the football practice, including Decedent, CRISTIAN ANGEL NAVARRO, to rest,
15 hydrate, and cool off during the practice could result in harm to the students, including Decedent,
16 CRISTIAN ANGEL NAVARRO.

17 47. At all times mentioned herein, Defendants' acts and/or omissions were a substantial factor
18 in causing Decedent CRISTIAN ANGEL NAVARRO's death.

19 48. At all times mentioned herein, Defendants' acts and/or omissions were a substantial factor
20 in causing Plaintiffs' harm.

21 49. As a direct and proximate result of Defendants' negligence, Plaintiff, CYNTHIA
22 SALCIDO, has and will in the future suffer economic damages, including but not limited to the loss of
23 the financial support that Decedent, CRISTIAN ANGEL NAVARRO, would have contributed to the
24 family, gifts or benefits that Plaintiff, CYNTHIA SALCIDO, would have expected to receive from
25 Decedent CRISTIAN ANGEL NAVARRO, funeral and burial expenses, and the reasonable value of
26 household services that Decedent, CRISTIAN ANGEL NAVARRO, would have provided. Plaintiff,
27 CYNTHIA SALCIDO, has and will continue to suffer the loss of Decedent, CRISTIAN ANGEL
28 NAVARRO's love, companionship, comfort, assistance, protection, affection, society, moral support,

1 and training and guidance. Plaintiff, CYNTHIA SALCIDO's damages exceed the minimum jurisdiction
2 of this Court.

3 50. As a direct and proximate result of Defendants' negligence, Plaintiff, MIKE ANGEL
4 NAVARRO, has and will in the future suffer economic damages, including but not limited to the loss
5 of the financial support that Decedent, CRISTIAN ANGEL NAVARRO, would have contributed to the
6 family, gifts or benefits that Plaintiff, MIKE ANGEL NAVARRO, would have expected to receive from
7 Decedent, CRISTIAN ANGEL NAVARRO, funeral and burial expenses, and the reasonable value of
8 household services that Decedent, CRISTIAN ANGEL NAVARRO, would have provided. Plaintiff,
9 MIKE ANGEL NAVARRO, has and will continue to suffer the loss of Decedent, CRISTIAN ANGEL
10 NAVARRO's love, companionship, comfort, assistance, protection, affection, society, moral support,
11 and training and guidance. Plaintiff, MIKE ANGEL NAVARRO's damages exceed the minimum
12 jurisdiction of this Court.

13 51. Plaintiffs' injuries, harm, and resulting general and special damages were a direct and
14 proximate result of the negligent, careless, wanton and unlawful acts and omissions of Defendants, and
15 each of them, as described herein.

16 **SECOND CAUSE OF ACTION**

17 **[Negligence – Survival Action]**

18 **(Against all Defendants)**

19 52. Plaintiffs repeat and reallege the allegations contained in Paragraphs 1 through 51,
20 hereinabove, and incorporate the same as though fully set forth herein.

21 53. As a legal, direct, and proximate result of the aforementioned conduct of the Defendants,
22 and each of them, Decedent, CRISTIAN ANGEL NAVARRO, was required to and did employ
23 physicians and surgeons for medical examinations, treatment, and care of injuries and did incur medical
24 and incidental expenses in an amount to be ascertained.

25 54. As a result of the foregoing, Plaintiffs, as the heirs of Decedent, CRISTIAN ANGEL
26 NAVARRO, and as his successors in interest, hereby assert survivors' claims on behalf of him, the
27 deceased, pursuant to California *Code of Civil Procedure* §§ 377.10, 377.20, 377.30, *et seq.*, and based
28 upon all other applicable statutes and case law and succeed to causes of action that might have been

1 brought by CRISTIAN ANGEL NAVARRO, deceased. Plaintiffs will file declarations under penalty
2 of perjury as required by *Code of Civil Procedure* § 377.32 concurrently with this Complaint.

3 55. As such, Plaintiffs are entitled to compensation for Decedent, CRISTIAN ANGEL
4 NAVARRO'S medical expenses, loss of earning capacity, and punitive damages.

5 **PRAYER FOR WRONGFUL DEATH AND SURVIVAL DAMAGES**

6 **WHEREFORE**, Plaintiffs, individually and as successors in interest and heirs, hereby pray for
7 judgment against Defendants, and each of them, as follows:

- 8 1. Medical expenses incurred by Decedent, CRISTIAN ANGEL NAVARRO, prior to his
9 death;
- 10 2. Loss of earning capacity;
- 11 3. Full value of life of the decedent for his wrongful death;
- 12 4. Loss of care, comfort, society, solace, moral support, guidance and services of Decedent,
13 CRISTIAN ANGEL NAVARRO, to his survivors, beneficiaries, and heirs;
- 14 5. Loss of support and services in money or in kind;
- 15 6. Loss of inheritance;
- 16 7. Funeral and burial expenses;
- 17 8. For prejudgment interest, according to proof;
- 18 9. For cost of suit incurred herein, according to proof;
- 19 10. For damages for Plaintiffs other losses, according to proof; and
- 20 11. For such other and further relief as the Court may deem just and proper.

21
22 DATED: November 17, 2020

ADAMSON AHDOOT LLP

23
24 

25 By: _____
26 PETER M. WILLIAMSON, Esq.
27 Attorneys for Plaintiffs
28 MIKE ANGEL NAVARRO and
CYNTHIA SALCIDO

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DEMAND FOR TRIAL BY JURY

Plaintiffs, MIKE ANGEL NAVARRO and CYNTHIA SALCIDO, individually, and as successors in interest to CRISTIAN ANGEL NAVARRO, deceased, hereby demand a trial by jury as to all causes of action.

DATED: November 17, 2020

ADAMSON AHDOOT LLP



By: _____
PETER M. WILLIAMSON, Esq.
Attorneys for Plaintiffs
MIKE ANGEL NAVARRO and
CYNTHIA SALCIDO

1 Christopher B. Adamson, Esq. (State Bar No. 238500)
Alan A. Ahdoot, Esq. (State Bar No. 238594)
2 Peter M. Williamson, Esq. (State Bar No. 97309)
ADAMSON AHDOOT LLP
3 1150 South Robertson Blvd.,
Los Angeles, California 90035
4 Telephone: (310) 888-0024
Facsimile: (888) 895-4665

5 Attorneys for Plaintiffs
6 MIKE ANGEL NAVARRO & CYNTHIA SALCIDO

7
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF RIVERSIDE – HISTORIC COURTHOUSE**
10 **UNLIMITED JURISDICTION**

12 MIKE ANGEL NAVARRO and CYNTHIA) CASE NO.:
SALCIDO, individually, and as successors in)
13 interest to CRISTIAN ANGEL NAVARRO,)
deceased;)
14) **PLAINTIFF CYNTHIA SALCIDO'S**
Plaintiff,) **AFFIDAVIT PURSUANT TO CALIFORNIA**
15) **CODE OF CIVIL PROCEDURE § 377.32**
v.)
16)
17 JURUPA UNIFIED SCHOOL DISTRICT,) [Filed Concurrently with the Complaint]
a Public Entity; CHRISTOPHER)
18 FOWLER, an individual, and DOES 1)
through 100, inclusive,)
19)
20 Defendants.)
21)

22 **AFFIDAVIT PURSUANT TO CALIFORNIA CODE OF CIVIL PROCEDURE § 377.32**

23 (Filed Concurrently with the Complaint)

24 I, CYNTHIA SALCIDO, hereby declare as follows:

- 25 1. The decedent in the subject litigation is my son, CRISTIAN ANGEL NAVARRO,
26 who died on October 1, 2020, in the City of Los Angeles, County of Los Angeles, California.
27 2. There is no proceeding now pending in California for administration of Decedent's estate.
28 3. I am the Decedent's successor in interest (as defined in *Code of Civil Procedure* § 377.1)

1 and succeed to the Decedent's interest in the action or proceeding.

2 4. There is no other person that has a superior right to commence the action or proceeding
3 or to be substituted for the Decedent in the pending action or proceeding.

4 5. Decedent, CRISTIAN ANGEL NAVARRO's Certificate of Death is attached hereto
5 as Exhibit "A".

6 I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing
7 is true and correct.

8
9 DATED: November 18, 2020



CYNTHIA SALCIDO

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT

“A”

STATE OF CALIFORNIA
CERTIFICATION OF VITAL RECORD

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC HEALTH

3052020233994

CERTIFICATE OF DEATH

3202019055395

STATE FILE NUMBER		CERTIFICATE OF DEATH				LOCAL REGISTRATION NUMBER	
1. NAME OF DECEDENT - FIRST (Given)		2. MIDDLE		3. LAST (Family)			
CRISTIAN		ANGEL		NAVARRO			
AKA, ALSO KNOWN AS - Include full AKA (FIRST, MIDDLE, LAST)		4. DATE OF BIRTH mm/dd/yyyy		5. AGE Yrs.		6. SEX	
		12/15/2004		15		M	
9. BIRTH STATE/FOREIGN COUNTRY		10. SOCIAL SECURITY NUMBER		11. EVER IN U.S. ARMED FORCES?		12. MARITAL STATUS/SDP* (at Time of Death)	
TX		637-94-2422		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK		NEVER MARRIED	
13. EDUCATION - Highest Level/Degree (See worksheet on back)		14/15. WAS DECEDENT HISPANIC/LATINO/SPANISH? (If yes, see worksheet on back)		16. DECEDENT'S RACE - Up to 3 races may be listed (see worksheet on back)		7. DATE OF DEATH mm/dd/yyyy	
10		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> UNK		HISPANIC		10/01/2020	
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.)		19. YEARS IN OCCUPATION			
STUDENT		EDUCATION		10			
20. DECEDENT'S RESIDENCE (Street and number, or location)		21. CITY		22. COUNTY/PROVINCE		23. ZIP CODE	
4269 AVON STREET		RIVERSIDE		RIVERSIDE		92509	
24. YEARS IN COUNTY		25. STATE/FOREIGN COUNTRY		26. INFORMANT'S NAME, RELATIONSHIP		27. INFORMANT'S MAILING ADDRESS (Street and number, or hotel suite number, PO, or town, state and zip)	
5		CA		MIKE A. NAVARRO, FATHER		4269 AVON STREET, RIVERSIDE, CA 92509	
28. NAME OF SURVIVING SPOUSE/SDP - FIRST		29. MIDDLE		30. LAST (BIRTH NAME)			
31. NAME OF FATHER/PARENT - FIRST		32. MIDDLE		33. LAST		34. BIRTH STATE	
MIKE		ANGEL		NAVARRO		CA	
35. NAME OF MOTHER/PARENT - FIRST		36. MIDDLE		37. LAST (BIRTH NAME)		38. BIRTH STATE	
CYNTHIA				SALCIDO		TX	
39. DISPOSITION DATE mm/dd/yyyy		40. PLACE OF FINAL DISPOSITION		41. TYPE OF DISPOSITION(S)		42. SIGNATURE OF EMBALMER	
10/17/2020		LA PAZ FAITH CENTER 1201 N. PIEDRAS ST., EL PASO, TX 79930		CR/TR/RES/BU		NOT EMBALMED	
43. LICENSE NUMBER		44. NAME OF FUNERAL ESTABLISHMENT		45. LICENSE NUMBER		46. SIGNATURE OF LOCAL REGISTRAR	
		TORRES CREMATION AND BURIAL SERVICES		FD2201		MUNTU DAVIS, M.D.	
47. DATE mm/dd/yyyy		101. PLACE OF DEATH		102. IF HOSPITAL, SPECIFY ONE		103. IF OTHER THAN HOSPITAL, SPECIFY ONE	
10/16/2020		RONALD REAGAN UCLA MEDICAL CENTER		<input checked="" type="checkbox"/> H <input type="checkbox"/> EPVCP <input type="checkbox"/> CCA <input type="checkbox"/> Hospice <input type="checkbox"/> Nursing Home/LTC <input type="checkbox"/> Decedent's Home <input type="checkbox"/> Other			
104. COUNTY		105. FACILITY ADDRESS OR LOCATION WHERE FOUND (Street and number, or location)		106. CITY		107. CAUSE OF DEATH	
LOS ANGELES		757 WESTWOOD PLAZA		LOS ANGELES		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 ventilator liberation without showing the etiology. DO NOT ABBREVIATE.	
108. LEADERS REPORTED TO CDC/EPD		109. BIRTH DATE		110. BIRTH PLACE		111. USED IN DETERMINING CAUSE?	
<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		2020-09161				<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		113. WAS OPERATION PERFORMED FOR ANY CONDITION IN ITEM 107 OR 112? (If yes, list type of operation and date)		113A. IF FEMALE, PRECINCT IN LAST YEAR?		114. I CERTIFY THAT TO THE BEST OF MY KNOWLEDGE DEATH OCCURRED AT THE HOUR, DATE, AND PLACE STATED FROM THE CAUSES STATED.	
NONE		NO		<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> UNK		Decedent Attended Since <input type="checkbox"/> Decedent Last Seen Alive <input type="checkbox"/>	
115. SIGNATURE AND TITLE OF CERTIFIER		116. LICENSE NUMBER		117. DATE mm/dd/yyyy		118. TYPE ATTENDING PHYSICIAN'S NAME, MAILING ADDRESS, ZIP CODE	
REGINA AUGUSTINE							
119. I CERTIFY THAT IN MY OPINION DEATH OCCURRED AT THE HOUR, DATE, AND PLACE STATED FROM THE CAUSES STATED.		120. INJURED AT WORK?		121. INJURY DATE mm/dd/yyyy		122. HOUR (24 Hours)	
<input type="checkbox"/> Natural <input type="checkbox"/> Accident <input type="checkbox"/> Homicide <input type="checkbox"/> Suicide <input checked="" type="checkbox"/> Pending Investigation <input type="checkbox"/> Could not be determined		<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> UNK					
123. PLACE OF INJURY (e.g., home, construction site, wooded area, etc.)		124. DESCRIBE HOW INJURY OCCURRED (Events which resulted in injury)		125. LOCATION OF INJURY (Street and number, or location, and city, and zip)		126. SIGNATURE OF CORONER / DEPUTY CORONER	
						REGINA AUGUSTINE	
127. DATE mm/dd/yyyy		128. TYPE NAME, TITLE OF CORONER / DEPUTY CORONER		129. TYPE NAME, TITLE OF CORONER / DEPUTY CORONER		130. TYPE NAME, TITLE OF CORONER / DEPUTY CORONER	
10/15/2020		REGINA AUGUSTINE, DEP. CORONER		REGINA AUGUSTINE, DEP. CORONER		REGINA AUGUSTINE, DEP. CORONER	
STATE REGISTRAR		FAX AUTH.#		GENSUS TRACT			
A B C D E							

CERTIFIED COPY OF VITAL RECORD
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

This is a true certified copy of the record filed in the County of Los Angeles Department of Public Health if it bears the Registrar's signature in purple ink.



002625044

DATE ISSUED

Health Officer and Registrar
Regina Augustine, MD
DO 14

OCT 26 2020

This copy is not valid unless prepared on an engraved border, displaying the date, seal and signature of the Registrar.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE



CALOSANGD1

STATE OF CALIFORNIA

CERTIFICATION OF VITAL RECORD

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC HEALTH

PHYSICIAN/CORONER'S AMENDMENT

3052020233994

STATE FILE NUMBER

1.1

NO ERASURES, WHITEOUTS, PHOTOCOPIES, OR ALTERATIONS

3202019055395

LOCAL REGISTRATION NUMBER

BIRTH [] DEATH [x] FETAL DEATH []

TYPE OR PRINT CLEARLY IN BLACK INK ONLY - THIS AMENDMENT BECOMES AN ACTUAL PART OF THE OFFICIAL RECORD

PART I INFORMATION TO LOCATE RECORD

Table with 5 columns: 1A. NAME—FIRST, 1B. MIDDLE, 1C. LAST, 2. SEX, 3. DATE OF EVENT—MM/DD/CCYY, 4. CITY OF EVENT, 5. COUNTY OF EVENT. Values include CRISTIAN, ANGEL, NAVARRO, M, 10/01/2020, LOS ANGELES, LOS ANGELES, 2 OF 2.

PART II STATEMENT OF CORRECTIONS

Table with 3 columns: 6. CERTIFICATE ITEM NUMBER, 7. INFORMATION AS IT APPEARS ON ORIGINAL RECORD, 8. INFORMATION AS IT SHOULD APPEAR. Rows 107A-125 list corrections such as DEFERRED, HYPERTHERMIA, DAYS, OBESITY, ACCIDENT, NO, 09/28/2020, UNK, ENVIRONMENTAL EXPOSURE.

I HEREBY DECLARE UNDER PENALTY OF PERJURY THAT THE ABOVE INFORMATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

DECLARATION OF CERTIFYING PHYSICIAN OR CORONER. Fields include: 9. SIGNATURE OF CERTIFYING PHYSICIAN OR CORONER (RICHARD OU), 10. DATE SIGNED (10/23/2020), 11. TYPED OR PRINTED NAME AND TITLE/DEGREE OF CERTIFIER (MD, MEDICAL EXAMINER), 12. ADDRESS (1104 NORTH MISSION ROAD), 13. CITY (LOS ANGELES), 14. STATE (CA), 15. ZIP CODE (90033), 16. OFFICE OF VITAL RECORDS OR LOCAL REGISTRAR (STATE REGISTRAR - OFFICE OF VITAL RECORDS), 17. DATE ACCEPTED FOR REGISTRATION (10/23/2020).

STATE OF CALIFORNIA, DEPARTMENT OF PUBLIC HEALTH, OFFICE OF VITAL RECORDS



FORM VS 24Ae (REV. 1/08)

1.1

CERTIFIED COPY OF VITAL RECORD

This is a true certified copy of the record filed in the County of Los Angeles Department of Public Health if it bears the Registrar's signature in purple ink.



Health Officer Registrar, DO 14, Signature of Registrar

DATE ISSUED

OCT 26 2020

This copy is not valid unless prepared on an engraved border, displaying the date, seal and signature of the Registrar.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE



CALOSANGD1

1 Christopher B. Adamson, Esq. (State Bar No. 238500) Alan
A. Ahdoot, Esq. (State Bar No. 238594)
2 Peter M. Williamson, Esq. (State Bar No. 97309)
ADAMSON AHDOOT LLP
3 1150 South Robertson Blvd.,
Los Angeles, California 90035
4 Telephone: (310) 888-0024
Facsimile: (888) 895-4665

5 Attorneys for Plaintiffs
6 MIKE ANGEL NAVARRO & CYNTHIA SALCIDO

7
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF RIVERSIDE – HISTORIC COURTHOUSE**
10 **UNLIMITED JURISDICTION**

11
12 MIKE ANGEL NAVARRO and CYNTHIA)
SALCIDO, individually, and as successors in)
13 interest to CRISTIAN ANGEL NAVARRO,)
deceased;

14)
15 Plaintiff,

16 v.

17 JURUPA UNIFIED SCHOOL DISTRICT,)
a Public Entity; CHRISTOPHER)
18 FOWLER, an individual, and DOES 1)
through 100, inclusive,

19)
20 Defendants.

CASE NO.:

PLAINTIFF MIKE ANGEL NAVARRO'S
AFFIDAVIT PURSUANT TO CALIFORNIA
CODE OF CIVIL PROCEDURE § 377.32

[Filed Concurrently with the Complaint]

21
22 **AFFIDAVIT PURSUANT TO CALIFORNIA CODE OF CIVIL PROCEDURE § 377.32**

23 (Filed Concurrently with the Complaint)

24 I, MIKE ANGEL NAVARRO, hereby declare as follows:

- 25 1. The decedent in the subject litigation is my son, CRISTIAN ANGEL NAVARRO
26 who died on October 1, 2020, in the City of Los Angeles, County of Los Angeles, California.
27 2. There is no proceeding now pending in California for administration of decedent's estate.
28 3. I am the Decedent's successor in interest (as defined in *Code of Civil Procedure* § 377.1)

1 and succeed to the decedent's interest in the action or proceeding.

2 4. There is no other person that has a superior right to commence the action or proceeding
3 or to be substituted for the decedent in the pending action or proceeding.

4 5. Decedent, CRISTIAN ANGEL NAVARRO's Certificate of Death is attached hereto
5 as Exhibit "A".

6 I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing
7 is true and correct.

8
9 DATED: November 18, 2020



MIKE ANGEL NAVARRO

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT

“A”

STATE OF CALIFORNIA

CERTIFICATION OF VITAL RECORD

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC HEALTH

3052020233994

CERTIFICATE OF DEATH

3202019055395

STATE FILE NUMBER		DATE OF DEATH USE BLACK INK ONLY / NO ERASURES, WHITEOUTS OR ALTERATIONS VS-1 (REV. 3/20)				LOCAL REGISTRATION NUMBER	
DECEDENT'S PERSONAL DATA	1. NAME OF DECEDENT - FIRST (Given) CRISTIAN		2. MIDDLE ANGEL		3. LAST (Family) NAVARRO		
	AKA, ALSO KNOWN AS - Include full AKA (FIRST, MIDDLE, LAST)						4. DATE OF BIRTH mm/dd/yyyy 12/15/2004
	9. BIRTH STATE/FOREIGN COUNTRY TX		10. SOCIAL SECURITY NUMBER 637-94-2422		5. AGE Yrs 15		6. SEX M
	13. EDUCATION - Highest Level/Degree (see worksheet on back) 10		14. WAS DECEDENT HISPANIC/LATINO/SPANISH? (if yes, see worksheet on back) <input checked="" type="checkbox"/> YES HISPANIC		12. MARITAL STATUS/GRIP (at Time of Death) NEVER MARRIED		7. DATE OF DEATH mm/dd/yyyy 10/01/2020
17. USUAL OCCUPATION - Type of work for most of life. DO NOT USE RETIRED STUDENT		18. KIND OF BUSINESS OR INDUSTRY (e.g., grocery store, road construction, employment agency, etc.) EDUCATION		8. HOUR (24 Hours) 1150			
USUAL RESIDENCE	20. DECEDENT'S RESIDENCE (Street and number, or location) 4269 AVON STREET						1 OF 2
	21. CITY RIVERSIDE		22. COUNTY/PROVINCE RIVERSIDE		23. ZIP CODE 92509		24. YEARS IN COUNTY 5
	25. STATE/FOREIGN COUNTRY CA						
INFORMANT	26. INFORMANT'S NAME, RELATIONSHIP MIKE A. NAVARRO, FATHER				27. INFORMANT'S MAILING ADDRESS (Street and number, or P.O. box number, city, or town, state and zip) 4269 AVON STREET, RIVERSIDE, CA 92509		
	SPOUSE/GRIP AND PARENT INFORMATION	28. NAME OF SURVIVING SPOUSE/GRIP - FIRST -		29. MIDDLE -		30. LAST (BIRTH NAME) -	
31. NAME OF FATHER/PARENT - FIRST MIKE		32. MIDDLE ANGEL		33. LAST NAVARRO		34. BIRTH STATE CA	
35. NAME OF MOTHER/PARENT - FIRST CYNTHIA		36. MIDDLE -		37. LAST (BIRTH NAME) SALCIDO		38. BIRTH STATE TX	
FUNERAL DIRECTORY LOCAL REGISTRAR	39. DISPOSITION DATE mm/dd/yyyy 10/17/2020		40. PLACE OF FINAL DISPOSITION LA PAZ FAITH CENTER 1201 N. PIEDRAS ST., EL PASO, TX 79930				43. LICENSE NUMBER -
	41. TYPE OF DISPOSITION(S) CR/TR/RES/BU		42. SIGNATURE OF EMBALMER NOT EMBALMED				
	44. NAME OF FUNERAL ESTABLISHMENT TORRES CREMATION AND BURIAL SERVICES		45. LICENSE NUMBER FD2201		46. SIGNATURE OF LOCAL REGISTRAR MUNTU DAVIS, M.D.		47. DATE mm/dd/yyyy 10/16/2020
PLACE OF DEATH	101. PLACE OF DEATH RONALD REAGAN UCLA MEDICAL CENTER						102. IF HOSPITAL, SPECIFY ONE <input checked="" type="checkbox"/> IP <input type="checkbox"/> ER/OP <input type="checkbox"/> DCA <input type="checkbox"/> Hospital <input type="checkbox"/> Nursing Home/LTC <input type="checkbox"/> Decedent's Home <input type="checkbox"/> Other
	104. COUNTY LOS ANGELES		105. FACILITY ADDRESS OR LOCATION WHERE FOUND (Street and number, or location) 757 WESTWOOD PLAZA			106. CITY LOS ANGELES	
	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 (A) DEFERRED None						108. CAUSE REFERRED TO CORONER? (A) YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> 2020-09161
CAUSE OF DEATH	109. SEQUENTIALLY list conditions, if any, leading to cause on Line A. Enter UNDERLYING CAUSE (disease or injury that initiated the events resulting in death) LAST None						108. BIOPSY PERFORMED? (B) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
	110. AUTOPSY PERFORMED? (C) YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>						111. USED IN DETERMINING CAUSE? (D) YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
	112. OTHER SIGNIFICANT CONDITIONS CONTRIBUTING TO DEATH BUT NOT RESULTING IN THE UNDERLYING CAUSE GIVEN IN 107 None						
PHYSICIAN'S CERTIFICATION	113. WAS OPERATION PERFORMED FOR ANY CONDITION IN ITEM 107 OR 127 (if yes, list type of operation and date) NO						113A. IF FEMALE, PREPREGNANT IN LAST YEAR? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> UNK
	114. I CERTIFY THAT TO THE BEST OF MY KNOWLEDGE DEATH OCCURRED AT THE HOUR, DATE, AND PLACE STATED FROM THE CAUSES STATED Decedent Attended Since: _____ Decedent Last Seen Alive: _____		115. SIGNATURE AND TITLE OF CERTIFIER REGINA AUGUSTINE				116. LICENSE NUMBER -
	118. TYPE ATTENDING PHYSICIAN'S NAME, MAILING ADDRESS, ZIP CODE REGINA AUGUSTINE		117. DATE mm/dd/yyyy 10/15/2020		117. DATE mm/dd/yyyy 10/15/2020		
CORONER'S USE ONLY	118. I 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 type="checkbox"/> Accident <input type="checkbox"/> Homicide <input type="checkbox"/> Suicide <input checked="" type="checkbox"/> Investigation <input type="checkbox"/> Could not be determined						119. INJURED AT WORK? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> UNK
	120. PLACE OF INJURY (e.g., home, construction site, wooded area, etc.)						121. INJURY DATE mm/dd/yyyy -
	122. DESCRIBE HOW INJURY OCCURRED (Events which resulted in injury)						122. HOUR (24 Hours) -
	123. LOCATION OF INJURY (Street and number, or location, and city, and zip)						
126. SIGNATURE OF CORONER / DEPUTY CORONER REGINA AUGUSTINE		127. DATE mm/dd/yyyy 10/15/2020		128. TYPE NAME, TITLE OF CORONER / DEPUTY CORONER REGINA AUGUSTINE, DEP. CORONER			
STATE REGISTRAR	A	B	C	D	E	CENSUS TRACT	

CERTIFIED COPY OF VITAL RECORD
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

This is a true certified copy of the record filed in the County of Los Angeles Department of Public Health if it bears the Registrar's signature in purple ink.



002625044

DATE ISSUED

Health Officer / Registrar *Regina Augustine, MD*

OCT 26 2020

This copy is not valid unless prepared on an engraved border, displaying the date, seal and signature of the Registrar.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE



CALOSANG01

STATE OF CALIFORNIA

CERTIFICATION OF VITAL RECORD

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC HEALTH

PHYSICIAN/CORONER'S AMENDMENT

3052020233994

STATE FILE NUMBER

1.1

NO ERASURES, WHITEOUTS, PHOTOCOPIES,
OR ALTERATIONS

320219055395

LOCAL REGISTRATION NUMBER

BIRTH DEATH FETAL DEATH

TYPE OR PRINT CLEARLY IN BLACK INK ONLY – THIS AMENDMENT BECOMES AN ACTUAL PART OF THE OFFICIAL RECORD

PART I INFORMATION TO LOCATE RECORD

INFORMATION AS IT APPEARS ON ORIGINAL RECORD	1A. NAME—FIRST CRISTIAN	1B. MIDDLE ANGEL	1C. LAST NAVARRO	2. SEX M
	3. DATE OF EVENT—MM/DD/CCYY 10/01/2020	4. CITY OF EVENT LOS ANGELES	5. COUNTY OF EVENT LOS ANGELES	2 OF 2

PART II STATEMENT OF CORRECTIONS

	6. CERTIFICATE ITEM NUMBER	7. INFORMATION AS IT APPEARS ON ORIGINAL RECORD	8. INFORMATION AS IT SHOULD APPEAR
LIST ONE ITEM PER LINE	107A	DEFERRED	HYPERTHERMIA
	107AT	-	DAYS
	112	NONE	OBESITY
	119	PENDING INVESTIGATION	ACCIDENT
	120		NO
	121		09/28/2020
	122		UNK
	123		UNK
	124		ENVIRONMENTAL EXPOSURE
	125		UNK,

I HEREBY DECLARE UNDER PENALTY OF PERJURY THAT THE ABOVE INFORMATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

DECLARATION OF CERTIFYING PHYSICIAN OR CORONER	9. SIGNATURE OF CERTIFYING PHYSICIAN OR CORONER ▶ RICHARD OU	10. DATE SIGNED—MM/DD/CCYY 10/23/2020	11. TYPED OR PRINTED NAME AND TITLE/DEGREE OF CERTIFIER MD, MEDICAL EXAMINER	
	12. ADDRESS—STREET and NUMBER 1104 NORTH MISSION ROAD	13. CITY LOS ANGELES	14. STATE CA	15. ZIP CODE 90033
STATE/LOCAL REGISTRAR USE ONLY	16. OFFICE OF VITAL RECORDS OR LOCAL REGISTRAR ▶ STATE REGISTRAR - OFFICE OF VITAL RECORDS		17. DATE ACCEPTED FOR REGISTRATION—MM/DD/CCYY 10/23/2020	

STATE OF CALIFORNIA, DEPARTMENT OF PUBLIC HEALTH, OFFICE OF VITAL RECORDS



FORM VS 24Ae (REV. 1/08)

1.1

CERTIFIED COPY OF VITAL RECORD
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

This is a true certified copy of the record filed in the County of Los Angeles Department of Public Health if it bears the Registrar's signature in purple ink.



002625045

DATE ISSUED
OCT 26 2020

Health Officer and Registrar
DO 14

This copy is not valid unless prepared on an engraved border, displaying the date, seal and signature of the Registrar.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE



CALOSANG01