C26-07872

Form Cont. 100-A (Rev. 12/18)

CLAIM FOR DAMAGES

TO PERSON OR PROPERTY

INSTRUCTIONS:

1. Claims for death, injury to person or to personal property must be filed not later than six months after the occurrence. (Gov. Code Sec. 911.2)
2. Claims for damages relating to any other type of occurrence must be filed not later than one year after the occurrence. (Gov. Code Sec. 911.2)
3. Read the entire claim and fill out all mandatory fields (* = **mandatory**) before filing. (Gov. Code Sec. 910, 910.2) THE FAILURE TO INCLUDE MANDATORY INFORMATION MAY RESULT IN YOUR CLAIM BEING RETURNED AS INSUFFICIENT. (Gov. Code Sec. 910.8)
4. If necessary, attach separate sheets to provide full details, referencing the appropriate claim section number. SIGN EACH SHEET.
5. Attach any relevant documents or reports supporting your claim.
6. Claim must be signed at the bottom of page 2.
7. Claims can only be filed with the City Clerk. (Gov. Code Sec. 915a) Claims can be filed online at https://claims.lacity.org/, in person or mailed to: CITY CLERK, 200 NORTH SPRING STREET, ROOM 395, CITY HALL, LOS ANGELES, CA 90012
8. FAXED OR EMAILED CLAIMS WILL NOT BE ACCEPTED.

RESERVE FOR FILING STAMP
CLAIM NO. _____

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BY _____ DEPUTY

TO: CITY OF LOS ANGELES

1. CLAIMANT INFORMATION:

***Name:** David James Healey Date of Birth: [redacted]

Email Address: --- ***Phone Number:** (use attorney phone number below)

***Address:** [redacted]

☒ Indicate if claim notices or communications should be sent to someone other than the claimant (e.g. attorney or insurance representative). **If checked, complete the information below:**

***Name:** Peter Bibring ***Relationship to Claimant:** attorney for Mr. Healey

Email Address: peter@bibringlaw.com ***Phone Number:** (213) 471-2022

***Address:** Law Office of Peter Bibring, 2210 W. Sunset Blvd. #203, Los Angeles, CA 90026

2. FACTUAL ALLEGATIONS:

***How did damage or injury occur?**

Mr. Healey is an 82-year-old photographer. Mr. Healey was at a protest on June 14, 2025, in downtown Los Angeles, observing the protest and taking photographs. Without justification, an LAPD mounted officer charged Mr. Healey from behind with his horse, knocking him to the ground. The mounted officer's horse then trampled Mr. Healey, causing injuries including to his legs, foot, and arm, and a broken ribs, among other injuries. As a result, Mr. Healey experienced pain & suffering, emotional distress and a chill of his constitutional rights. Mr. Healey never posed any threat to anyone. Other people attending the protest helped Mr. Healey to safety. No LAPD officers or other City personnel offered any medical aid or other assistance. Publicly filed videos of the incident are available at https://tinyurl.com/yrs6jpjr

***Please provide the date and time of the damage or injury.** June 14, 2025, shortly after 4 p.m.

***Where did damage or injury occur?** Please provide the closest street address or cross-street and use the diagram on page 2.

N. Los Angeles Street & Aliso St.

***Why do you claim the City of Los Angeles is responsible for your damage or injury?**

The mounted officer hit and trampled Mr. Healey with his horse without justification and in retaliation for Mr. Healey's expressive conduct, in violation of his rights under the First, Fourth, and Fourteenth amendments, failed to make reasonable accommodation for Mr. Healey under the ADA and rehabilitation act; battered Mr. Healey and/or acted negligently and with reckless disregard of Mr. Healey's rights to be free from excessive force and to engage in expressive conduct in violation of California law, including but not limited to under Civil Code section 52.1 and the California constitution.

SEE PAGE 2 (OVER)

THIS CLAIM MUST BE SIGNED ON REVERSE SIDE

3. WITNESSES AND INVOLVED PARTIES:

***Give the names of City employees and their contact information, City vehicle license plate numbers, and the City department or bureau responsible for the act or omission you claim caused the damage or injury, if known.**

Unknown.

Did you report the act or omission? If so, please identify who you reported it to, provide their contact information and any report, service or claim numbers.

The incident has been identified as an example of wrongful force used against the press in a lawsuit, Los Angeles Press Club v. City of Los Angeles, No. 2::25-cv-05423-HDV-E (C.D. Cal.).

Please list the names and contact information for Witnesses, Doctors and Hospitals

In the above litigation, LAPD Lt. Jasmin Gomez of Risk Management identified relevant body camera footage from LAPD Officer Daughtry, LAPD Officer Olmos, LAPD Sergeant De Anda. Mr. Healey received treatment for his injuries at the West Los Angeles VA Medical Center in Westwood.

4. DAMAGES:

***What damage or injuries do you claim resulted?** broken rib, injuries incl. to legs, foot, and arm; pain & suffering; emotional distress.

***What is the total amount of your claim:** $ exceeds $10,000

***Itemize your damages:** ☐ Property Damages: $_____ ■ Bodily Injury: $ exceeds $10,000

☐ Other (specify) _____ : $_____

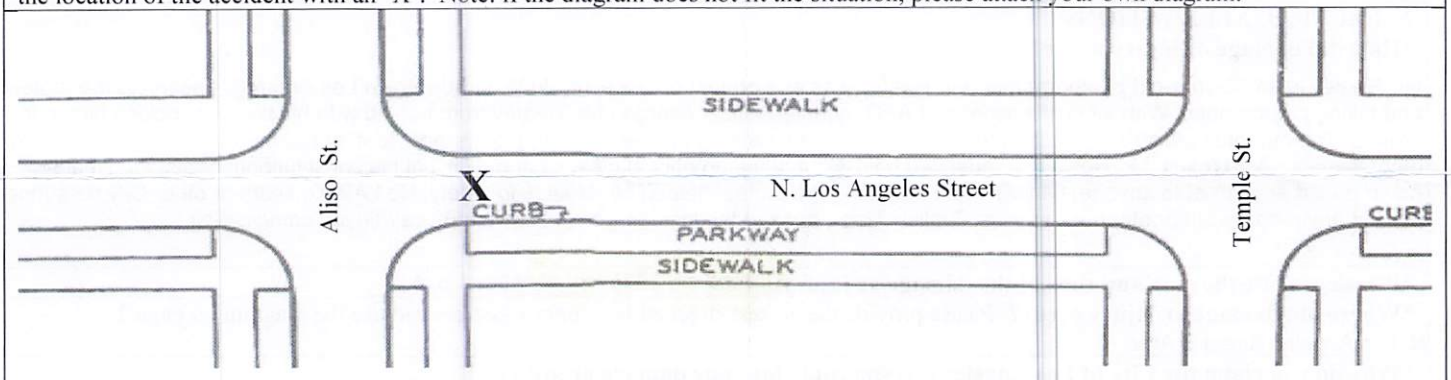
Attach any relevant documents or reports supporting your claimed damages.

5. INSURANCE:

If you had insurance at the time of the act or omission, please give the name and contact information for your insurance company, handling representatives and any amounts paid:

6. ACCIDENT DIAGRAM:

For all accident claims, place the street names where the accident occurred and the nearest cross-streets on the diagram, while indicating the location of the accident with an "X". Note: if the diagram does not fit the situation, please attach your own diagram.



I declare under penalty of perjury that the foregoing, including any attachments, is true and correct:

Peter Bibring — October 31, 2025

***Signature of Claimant or Person Filing on Claimant's Behalf** | Print Name | Date

attorney for claimant

Relationship to Claimant

CRIMINAL PENALTY FOR PRESENTING A FALSE OR FRAUDULENT CLAIM IS IMPRISONMENT OR FINE OR BOTH. (PENAL CODE §72)

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City Hall
Los Angeles, CA 90012

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