

BOARD OF SUPERVISORS OF CONTRA COSTA COUNTY
INSTRUCTIONS TO CLAIMANT

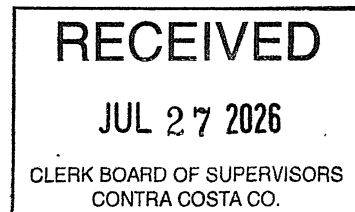
- A. A claim relating to a cause of action for death or for injury to person or to personal property or growing crops shall be presented not later than six months after the accrual of the cause of action. A claim relating to any other cause of action shall be presented not later than one year after the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

Reserved for Clerk's filing stamp

JOHN DOE, a minor, through his G.A.L.
Sage Mola
Against the County of Contra Costa or

District)
(Fill in the name)



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

1. When did the damage or injury occur? (Give exact date and hour)
2024 - Present, See Attached.
2. Where did the damage or injury occur? (Include city and county)
John A. Davis Juvenile Hall, Contra Costa County, See attached.
3. How did the damage or injury occur? (Give full details; use extra paper if required)
See attached. Sexual abuse of a minor by unlicensed, unsupervised county employee.
4. What particular act or omission on the part of county or district officers, servants or employees caused the damage or injury?
Abuser was employed by the County as victim/claimant's therapist.
5. What are the names of county or district officers, servants or employees causing the damage or injury?
Sofia Ann - Buitron Drotts, and all supervisors.
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.)

Post one future physical, Mental, emotional, and ~~financial~~ financial injuries.

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

Currently not known to claimant

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

N/A See attached.

DATE

TIME

AMOUNT

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

SEND NOTICES TO: (Attorney)

Name and address of Attorney

John C. Burris
Katherine A MacElhiney
7677 Oakport St. Suite 1120
Oakland, CA 94621

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(Claimant's Signature)

(Address)

Telephone No. 510 - 838 - 5200

) Telephone No. 510 - 839 - 5200

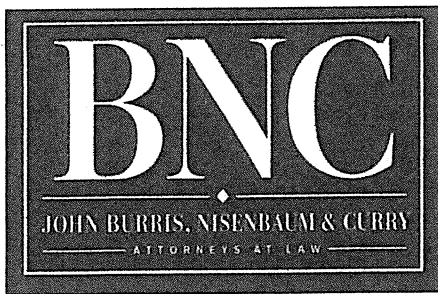
PUBLIC RECORDS NOTICE:

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 (\$10,000.00), or by both such imprisonment and fine.



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Oakland, CA 94621
Office: (510) 839-5200
Fax: (844) 273-6873

July 26, 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

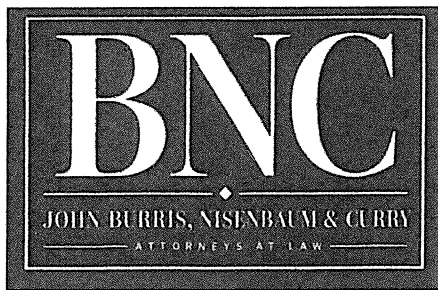
Re: Representation of "JOHN DOE," a minor, by and through his Guardian ad Litem, Sage Moala – GOVERNMENT TORT CLAIM

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

This is to inform you that John Burris, Nisenbaum & Curry, LLP., represents "JOHN DOE," by and through his *Guardian ad Litem*, Sage Moala. JOHN DOE is and was at all relevant times a minor under the age of eighteen and a ward of the County of Contra Costa and/or State of California. Based on my client's previous interaction with you and/or your organization, my client suffered past, present, and future physical, emotional, and/or financial injury or hardship. My understanding of the incident is as follows:

Beginning in 2024, at which time JOHN DOE was approximately fifteen years old, he began serving two years in County custody at the JOHN A. DAVIS JUVENILE HALL. Around that time the County also appointed SOFIA ANN-BUITRON DROTTS, a CONTRA COSTA COUNTY HEALTH employee, as DOE'S clinical therapist and/or social worker. Drotts is currently twenty-six years old and is nine years older than DOE. Drotts routinely engaged in inappropriate communications with, and sexual harassment and abuse of JOHN DOE while acting as his therapist. JOHN DOE is and was at all relevant times a minor unable to comprehend or consent to a sexual relationship with an adult. DOE could not refuse the court-appointed mental health treatment because he was a prisoner, making him particularly vulnerable.

During the two years in which DOE was incarcerated at the juvenile Hall, Drotts abused her position as his therapist to establish an inappropriate emotional connection with DOE, "grooming" him with the objective of sexual abuse. Drotts used DOE'S therapy sessions as an opportunity to establish herself as a friend and girlfriend to DOE instead of treating him. Drotts abused her County-given power and access to DOE'S private records and information to further manipulate and coerce DOE. Drotts additionally made harassing, explicit, and inappropriate communications with JOHN DOE while he was incarcerated at the John A. Davis Juvenile Hall outside of professional hours. Drotts took advantage of her therapist-client relationship with



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DOE for her own gratification, instead of providing him with the mental healthcare he needed, permanently and irreparably damaging DOE'S progress and well-being.

For two years, John DOE was locked inside John A. Davis Juvenile Hall with his abuser, making him particularly vulnerable. No supervisor of Drotts noticed this going on under their noses. The County employed no safety net to monitor for and identify Ms. Drott's predatory behavior. As a result, Contra Costa County and the State utterly failed to protect JOHN DOE, a child, from sexual abuse by an adult employed by the County, for which the County and State are liable.

In April of 2026, JOHN DOE was released from the Juvenile Hall. DOE was placed within the control and care of CONTRA COSTA COUNTY PROBATION DEPARTMENT, with Sofia Ann-Buitron Drotts continuing her role as DOES' therapist through Contra Costa Health. Simultaneously, Drotts was having unlawful sexual contact with DOE. As DOE'S therapist Drotts took part in regular wrap-around service meetings in which she discussed DOE'S mental health and rehabilitation with multiple professionals employed by the County Probation and Health Departments. These meetings allowed Drotts the opportunity to pull the strings of DOE'S future outcomes and even his carceral status. This team of County agents and supervisors failed to identify the red flags or supervise Drotts, and so the sexual abuse continued

After DOE's release from John Davis Juvenile Hall, Drotts was holding "therapy sessions" with JOHN DOE in her personal vehicle which she used to transport DOE to public places – alone – in violation of the laws of her profession. Drotts also encouraged JOHN DOE to regularly miss school and ignore his curfew to rendezvous with Drotts in violation of his probation. Eventually DOE began staying the night at Ms. Drotts' home in San Francisco without parental consent in violation of the Penal Code. DOE was on an ankle monitor at the time, and Contra Costa County Probation Department has changed JOHN DOE'S probation officer at least four times since DOE was released in early April, but this conduct went overlooked and unreported for months.

On June 19, 2026, officers of the City of City of Concord Police Department and/or the Contra Costa County Probation Department conducted a warrantless search of Claimants' residence in violation of their rights, claiming they were looking for evidence of a crime allegedly committed by DOE. John DOE was arrested but released without charge. Upon information and belief, it was not until this illegal search occurred and DOE'S personal items were seized that anyone from Contra Costa County reported or began to investigate the egregious abuse of John DOE by Sofia Drotts. Ms. Drotts was not arrested for charges related to the allegations contained herein until mid-July, 2026.

The egregious nature of the allegations against Ms. Drotts raises serious questions about the sufficiency of the County's [and State's] hiring, training, supervision, and safety protocols involving minors. Contra Costa County and the State of California, through their subsidiary



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agencies, breached their duty to protect DOE, causing him to be sexually harassed and abused by Drotts. The government failed to allocate the resources, staff, and management controls necessary to protect JOHN DOE, and others similarly situated, 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 a minor. The County furthermore failed to implement and enforce safety protocols and procedural safeguards to investigate red flags regarding the therapist-client relationship, and/or to file mandatory reports regarding the suspected abuse or client-therapist misconduct.

As a result, JOHN DOE 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 violation of due process of law and federal and state statutory and constitutional rights, and are entitled to recover damages according to proof, including exemplary damages.

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

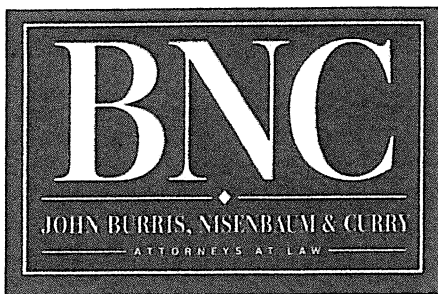
Respectfully,

/s/ John L. Burris

John L. Burris, Esq.

Katherine A. MacElhiney, Esq.

Attorneys for JOHN DOE



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Concord, California;
Contra Costa County;

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.

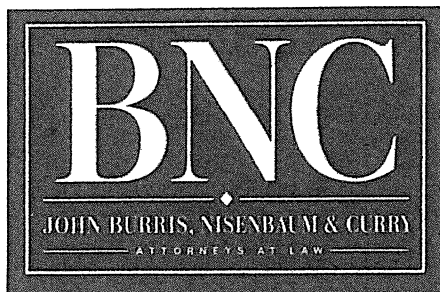
DESCRIPTION OF INCIDENT:

Beginning in 2024, at which time JOHN DOE was approximately fifteen years old, he began serving two years in County custody at the JOHN A. DAVIS JUVENILE HALL. Around that time the County also appointed SOFIA ANN-BUITRON DROTTS, a CONTRA COSTA COUNTY HEALTH employee, as DOE’S clinical therapist and/or social worker. DROTTS routinely engaged in inappropriate communications with, and sexual harassment and abuse of JOHN DOE while acting as his therapist.

Drotts is currently twenty-six years old and is nine years older than DOE. JOHN DOE is and was at all relevant times a minor unable to comprehend or consent to a sexual relationship with an adult. DOE was particularly vulnerable to being preyed on by Ms. Drotts because he could not refuse the court-appointed mental health treatment.

During the two years in which DOE was incarcerated at the County juvenile facility, Drotts abused her position as his therapist to establish an inappropriate emotional connection with DOE with the objective of “grooming” him for sexual abuse. Drotts used DOE’S therapy sessions to establish herself as a friend and girlfriend to DOE instead of treating him. Drotts abused her County-given power and access to DOE’S private records and information to further manipulate and coerce DOE. Drotts additionally made harassing, explicit, and inappropriate communications with JOHN DOE while he was incarcerated at the John A. Davis Juvenile Hall outside of professional hours. Drotts’ conduct irreparably damaged DOE’S progress and well-being. Drotts took advantage of her therapist-client relationship with DOE for her own gratification, instead of providing him with the mental healthcare he needed.

For two years, John DOE was locked inside John A. Davis Juvenile Hall with his abuser, making him particularly vulnerable. The County employed no safety net to monitor for and identify Ms. Drott’s predatory behavior. As a result, Contra Costa County and the State utterly failed to protect JOHN DOE, a child, from sexual abuse by an adult employed by the County, for which the County and State are liable.



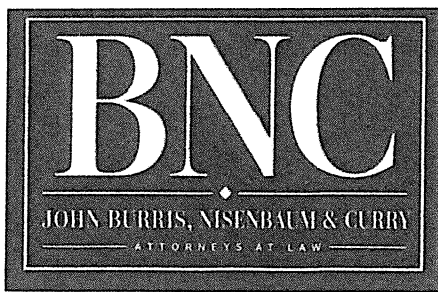
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In April of 2026, JOHN DOE was released from the Juvenile Hall at which point he was under the control and care of the CONTRA COSTA COUNTY PROBATION DEPARTMENT, with Contra Costa Health providing ongoing rehabilitation and mental health treatment and authority. During this time Sofia Ann-Buitron Drotts continued her role as DOES' therapist while simultaneously having unlawful sexual contact with DOE. As DOE'S therapist Drotts took part in regular wrap-around service meetings in which she discussed DOE'S mental health and rehabilitation with multiple professionals employed by the County Probation and Health Departments. These meetings allowed Drotts the opportunity to pull the strings of DOE'S future outcomes and even his carceral status. Moreover, Drotts began holding "therapy sessions" with JOHN DOE where she would take him to public places alone, in violation of the laws of her profession. Contra Costa County supervisors and authorities within many overlapping subsidiary agencies totally failed to monitor JOHN DOE'S treatment or to supervise Sofia Drotts' conduct, and the sexual abuse continued.

Drotts also encouraged JOHN DOE to regularly miss school and ignore his curfew to rendezvous with Drotts. Eventually DOE began staying the night at Ms. Drotts' home in San Francisco without parental consent in violation of the law. DOE was on an ankle monitor at the time, but somehow the strange locations went unnoticed or concealed. Indeed, Contra Costa County Probation Department has changed JOHN DOE'S probation officer at least four times since DOE was released in early April.

On June 19, 2026, officers of the City of City of Concord Police Department and/or the Contra Costa County Probation Department conducted a warrantless search of Claimants' residence in violation of their rights, claiming they were looking for evidence of a crime committed by DOE. John DOE was arrested but released without charge. Upon information and belief, it was not until this illegal search occurred and DOE'S personal items were seized that anyone from Contra Costa County reported or began to investigate the egregious abuse of John DOE. Ms. Drotts was not arrested for charges related to the allegations contained herein until mid-July, 2026.

The egregious nature of the allegations against Ms. Drotts raises serious questions about the sufficiency of the County's [and State's] hiring, training, supervision, and safety protocols involving minors. Contra Costa County and the State of California, through their subsidiary agencies, breached their duty to protect DOE, causing him to be sexually harassed and abused by Drotts. The government failed to allocate the resources, staff, and management controls necessary to protect JOHN DOE, and others similarly situated, 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 a minor, JOHN DOE. The County furthermore failed to implement and enforce safety protocols and procedural safeguards to investigate red flags



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regarding the therapist-client relationship, and/or to file mandatory reports regarding the suspected abuse or client-therapist misconduct.

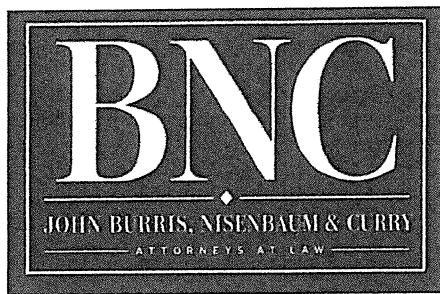
DESCRIPTION OF CLAIM:

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 negligent infliction of emotional distress.

Claimant alleges those individual employees, agents and/or servants of AGENCY 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 AGENCY, and DOES 1-100, and/or each of them, individually and/or while acting in concert with one another.

Claimant alleges the *nonexhaustive* appropriate offenses listed below:

Rape;
Statutory Rape;
Unlawful Intercourse with a Minor;
Solicitation of Child Pornography;
Voyeurism;
Assault;
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,
Breach of Fiduciary Duty;
Failing to prevent sexual abuse;
Negligence;
Negligent Hiring
Negligent Supervision
Negligent Retention
Negligent Infliction of Emotional Distress;



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Failure to Investigate;
Failure to Report;
Cover-Up or Concealment;
Premises Liability;
Vicarious Liability;
Harassment;
Negligence;
Emotional Distress.

DESCRIBE INJURY OR DAMAGE: JOHN DOE 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 violation of due process of law and federal and state statutory and constitutional rights, and are entitled to recover damages according to proof, including 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 AGENCY involved in the ongoing violations of our client's rights.

DEMAND FOR PRESERVATION OF EVIDENCE:

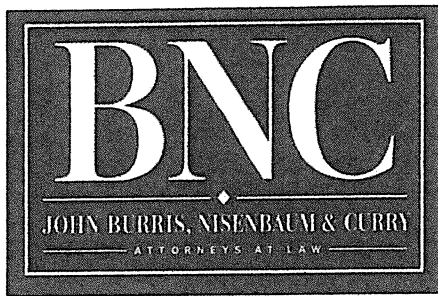
Claimant does hereby demand that AGENCY including, but not limited to, the appropriate city or county law enforcement agency, its employees, servants and/or attorneys, maintain and preserve all evidence, documents and tangible materials which relate in any manner whatsoever to the subject matter of this 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 is in excess of \$ 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: July 26, 2026

/s/ John L. Burris



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ADDENDUM

ATTACHMENT – 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: JOHN DOE,
by and through his Guardian ad Litem, Sage Moala.

ADDRESS TO WHICH ALL NOTICES ARE TO BE SENT:

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

CLAIMANTS' TELEPHONE NUMBER: (510) 839-5200

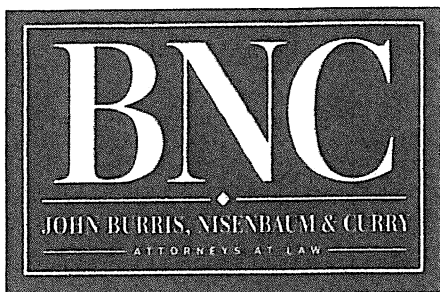
DATE AND TIME OF INCIDENT: 2024 to present.

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;
202 Glacier Dr., Martinez, CA 94553;



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John L. Burris,
Katherine A. MacElhiney
Attorneys for JOHN DOE