

# Los Angeles County Sheriff's Department

Audit and Accountability Bureau



## Public Comments Audit

Patrol Operations –

North Patrol Division –

Lancaster Sheriff's Station



Alex Villanueva, Sheriff

Audit No. 2019-5-A

January 7, 2020

**LOS ANGELES COUNTY SHERIFF'S DEPARTMENT  
Audit and Accountability Bureau**

**PUBLIC COMMENTS AUDIT – PATROL OPERATIONS  
NORTH PATROL DIVISION – LANCASTER SHERIFF'S STATION  
Project No. 2019-5-A  
AUDIT REPORT**

**PURPOSE**

The Audit and Accountability Bureau (AAB) conducted the Public Comments Audit – Patrol Operations – North Patrol Division, Lancaster Sheriff's Station under the authority of the Sheriff of Los Angeles County. The audit was performed to determine how the Los Angeles County Sheriff's Department (Department) adhered to the provisions of the United States Department of Justice (DOJ) Antelope Valley Settlement Agreement (AV Agreement)<sup>1</sup> regarding public comments, specifically service and personnel complaints documented on the Service Comment Report (SCR).<sup>2</sup>

The AAB conducted this audit under the guidance of Generally Accepted Government Auditing Standards.<sup>3</sup> The AAB determined the evidence obtained was sufficient and appropriate to provide reasonable assurance of the results based on the audit objectives.

**BACKGROUND**

On April 28, 2015, the Department entered into the AV Agreement with the DOJ regarding police services in the Antelope Valley area which includes the cities of Lancaster and Palmdale, and the surrounding unincorporated Los Angeles County areas. In the AV Agreement, the Department agreed to ensure all public complaints are received, properly classified, and fully and fairly investigated.

The Department classifies public complaints into two categories: service complaints and personnel complaints.<sup>4</sup> Service complaints are external communications of dissatisfaction with Department service, procedure or practice, response time, traffic citation, and those not involving employee misconduct. Personnel complaints are external allegations of misconduct against a Department member, either a violation of law or Department policy, to include but not limited to: discourtesy; dishonesty; unreasonable force; improper tactics; improper detention, search or arrest; neglect of duty; operation of vehicle; off-duty conduct; harassment; or discrimination.

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<sup>1</sup> United States Department of Justice – Los Angeles County Sheriff's Department, Settlement Agreement Number CV 15-03174, April 2015.

<sup>2</sup> Manual of Policy and Procedures §3-04/010.05, Procedures for Department Service Reviews, December 2013.

<sup>3</sup> United States Government Accountability Office, Government Auditing Standards, July 2018.

<sup>4</sup> Manual of Policy and Procedures §3-04/010.00, Department Service Reviews, December 2013.

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Public trust is vital to the Department’s mission and rests on the Department’s responsiveness to community needs and expectations. To foster public confidence in the Department and to promote constructive communication, public comments must be received with equal professional interest and courtesy, and given appropriate supervisory attention.<sup>5</sup>

### **PRIOR AUDITS**

The AAB has conducted two prior public comments audits for Lancaster Sheriff’s Station. The first audit (Project No. 2015-4-A) included ten recommendations, of which one has been implemented. The second audit (Project No. 2017-13-A) included two recommendations, of which neither have been implemented. The pending recommendations for the prior audits are policy related and corresponding revisions are pending Department approval.

### **METHODOLOGY**

#### **Scope**

The audit encompassed three main objectives and included an evaluation of completed SCR reviews from Lancaster Sheriff’s Station. For the purposes of this audit, a SCR review was considered completed when approved and signed by the division commander.

- Objective No. 1 – Complaint Intake – To determine if complaint forms and informational materials are available to the public; if all complaints were accepted and reviewed; and if the complainant was not discouraged from filing a complaint.
- Objective No. 2 – Complaint Classification – To determine if Department complaint investigation related policies were revised; if complaints were appropriately classified; and if all allegations of misconduct were documented and investigated.
- Objective No. 3 – Investigations – To determine if complaints were investigated thoroughly and by the appropriate/required individuals; if all persons at the scene giving rise to a misconduct allegation were identified; and if interviews were performed, conducted separately, and recorded in their entirety.

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<sup>5</sup> Manual of Policy and Procedures §3-04/000.00, Personnel Investigations, April 1996.

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Auditors reviewed documentation comprised of completed SCR forms, Result of Service Comment Review forms, associated memoranda, correspondence, reports, audio and video recordings, and photographs. The SCR reviews were obtained from Lancaster Sheriff’s Station and Risk Management Bureau’s Discovery Unit.

In order to measure the Department’s compliance with the provisions of the AV Agreement, auditors conducted a qualitative assessment, as necessary, throughout the audit. This included an assessment of all available documentation for each SCR review to determine whether the complaints were received, appropriately classified, and fully and fairly investigated, up to the adjudication of the complaint, in compliance with the applicable criteria.<sup>6</sup>

### **Audit Time Period**

The audit time period was from October 1, 2018, through December 31, 2018.

### **Audit Population**

All documented service and personnel complaints generated by the public against Department members and Lancaster Sheriff’s Station, which were fully investigated with final approval by a commander at the division level, were included in the population. Thirty SCR reviews were identified from the data sources for the audit time period. Of the 30 SCR reviews, 26 were personnel complaints, one was a service complaint, and three were dual (personnel and service) complaints.

The SCR population was identified through the Performance Recording and Monitoring System (PRMS), Service Comment Module.<sup>7</sup> The population was also cross referenced with entries in the Station/Bureau Administration Portal (SBAP).<sup>8</sup> External commendations documented on SCR forms were not included in the audit.

Patrol station watch commanders are responsible for documenting in the Watch Commander’s Daily Log when a public complaint is received. This includes documenting anytime an SCR form is completed. The Watch Commander’s Daily Log is stored as an electronic record in the SBAP.

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<sup>6</sup> AV Agreement, XI. Monitoring, B. Compliance Reviews and Audits, paragraph 149, April 2015, states compliance reviews and audits will contain both qualitative and quantitative elements as necessary for reliability and comprehensiveness.

<sup>7</sup> The PRMS provides systematic recording of data relevant to incidents involving uses of force, shootings, and commendations/complaints involving Department personnel. The Service Comment Module contains information on personnel and service complaints.

<sup>8</sup> The SBAP is a data entry system designed to collect and track data related to risk management incidents at patrol stations. The system includes data on use of force, traffic collisions, public comments, pursuits, administrative investigations, and employee injuries and lawsuits/claims.

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Auditors identified varying populations in order to examine the different aspects of the three main objectives, which are described in the Audit Details and Results section of this report.

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**AUDIT DETAILS AND RESULTS**

**Objective No. 1 – Complaint Intake**

**Objective No. 1(a) – Determine if English personnel complaint forms and informational materials are made available to the public, as required per the AV Agreement.**

Criteria

Antelope Valley Settlement Agreement, Subsection A, Complaint Intake, paragraph 124 (April 2015), states:

*LASD shall continue to make personnel complaint forms and informational materials, including brochures and posters, available at appropriate County or municipal properties in the Antelope Valley, including, at a minimum, LASD stations, courts, county libraries, and LASD websites, and make them available to community groups upon request.*

Procedures

Auditors identified seven sites, six properties in the Antelope Valley and the Department’s website which are required to have personnel complaint forms and informational materials available according to the AV Agreement. The six properties are Lancaster Sheriff’s Station, Antelope Valley Court, Antelope Valley Juvenile Court, Lake Los Angeles Library, Lancaster Library, and Quartz Hill Library.

Auditors visited the six properties and the Department’s website to determine whether English personnel complaint forms and informational materials were available to the public.

Results

Four of the seven sites (57%) met the criteria for the objective of informational materials being available to the public. All seven sites had complaint forms and brochures. However, posters were not available at three of the seven sites. Specifically, Antelope Valley Court, Antelope Valley Juvenile Court, and Lancaster Library.

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**Objective No. 1(b) – Determine if all personnel complaints made during the audit time period were accepted and reviewed.**

Criteria

Antelope Valley Settlement Agreement, Subsection A, Complaint Intake, paragraph 125 (April 2015), states:

*LASD will continue to accept all personnel complaints, including anonymous and third-party complaints, for review and investigation. Complaints may be made in writing or verbally, in person or by mail, telephone (or TDD), facsimile, or electronic mail, as well as in the field...*

Procedures

Of the available complaint reporting methods, the auditors determined that the most efficient method to measure this objective was to listen to and evaluate recorded telephone calls made to the watch commander’s line at Lancaster Station. Auditors identified 453 recorded telephone calls made to the watch commander’s line at Lancaster Station during the audit time period. A statistically valid random sample<sup>9</sup> of 79 recorded telephone calls was selected to determine whether all personnel complaints that were reported were accepted and reviewed. Of the 79 telephone calls, 73 were not complaints. The remaining six telephone calls were complaints and were evaluated for this objective.

Results

All six complaint telephone calls (100%) met the criteria for this objective.

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<sup>9</sup> Using a statistical one-tail test with a 95% confidence level and a 4% error rate, a statistically valid sample was identified.

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**Objective No. 1(c) – Determine if non-English language complaint forms and informational materials and/or translation services are available to Limited English Proficient (LEP) individuals.**

Criteria

Antelope Valley Settlement Agreement, Subsection A, Complaint Intake, paragraph 125 (April 2015), states:

*... Any Limited English Proficient (LEP) individual who wishes to file a complaint about a LASD deputy or employee shall be provided with a complaint form and informational materials in the appropriate non-English language and/or be provided appropriate translation services in order to file a complaint.*

Procedures

Auditors conducted visits at the six properties and the Department’s website to determine whether non-English language complaint forms and informational materials and/or translation services were available to LEP individuals.

Results

All seven sites (100%) met the criteria for the objective.

**Objective No. 1(d) – Determine if a Department member refused to accept a personnel complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint.**

Criteria

Antelope Valley Settlement Agreement, Subsection A, Complaint Intake, paragraph 126 (April 2015), states:

*The refusal to accept a personnel complaint, discouraging the filing of a complaint, or providing false or misleading information about filing a complaint, shall be grounds for discipline, up to and including termination.*

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Procedures

Auditors evaluated the 30 SCR reviews identified for the audit time period, including related source documentation and audio/video files, to determine whether a Department member refused to accept a personnel complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint.

Results

All 30 SCR reviews (100%) met the criteria for this objective.

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**Objective No. 2 – Complaint Classification**

**Objective No. 2(a) – Determine if complaint investigation related policies were revised, as required per the AV Agreement.**

Criteria

Antelope Valley Settlement Agreement, Subsection B, Complaint Classification, paragraph 127 (April 2015), states:

*LASD will revise its complaint investigation related policies, including MPP 3-04 and its Service Comment Report (SCR) and Internal Affairs Bureau (IAB) policy manuals, to ensure that they are complete, clear and consistent...*

Antelope Valley Settlement Agreement, Subsection B, Complaint Classification, paragraph 129 (April 2015), states:

*In consultation with the Monitor and subject to DOJ approval, LASD will revise policies to clarify and strengthen requirements related to:*

- a. which allegations of inappropriate behavior by LASD personnel, if true, would require imposition of discipline, as opposed to non-disciplinary action, to address the misconduct;*
- b. what types of personnel complaints must be investigated as administrative investigations rather than handled exclusively as Service Comment Reviews;*

Procedures

Auditors requested the complaint investigation related policies to determine whether the Department revised these policies, specifically the Manual of Policy and Procedures (MPP) 3-04/000.00, Personnel Investigations, and other related service review policies, the SCR Handbook, and the Internal Affairs Bureau (IAB) policy manual.

Results

This objective is not applicable because Lancaster Sheriff’s Station is not responsible for the revisions of complaint investigation related policies. The Department’s compliance of this AV Agreement requirement is further discussed in the Other Related Matters section of this report.

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**Objective No. 2(b) – Determine if personnel complaints were not classified as service complaints.**

Criteria

Antelope Valley Settlement Agreement, Subsection B, Complaint Classification, paragraph 128 (April 2015), states:

*LASD will ensure that personnel complaints are not classified as service complaints.*

Procedures

Auditors evaluated the three dual (personnel and service) SCR reviews and the one service SCR review, including related source documentation and audio/video files, to ensure they were properly classified as service complaints.

Results

All four SCR reviews (100%) met the criteria for this objective.

**Objective No. 2(c) – Determine if the unit commander appropriately classified each allegation and personnel complaint.**

Criteria

Antelope Valley Settlement Agreement, Subsection B, Complaint Classification, paragraph 130 (April 2015), states:

*Antelope Valley unit commanders shall be responsible for appropriately classifying each allegation and personnel complaint raised at the outset or during the investigation/review of a complaint...*

Procedures

Auditors evaluated the 30 SCR reviews, including related source documentation and audio/video files, to determine whether the unit commander appropriately classified each allegation and personnel complaint.

Results

All 30 SCR reviews (100%) met the criteria for this objective.

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**Objective No. 2(d) – Determine if all allegations of misconduct were investigated.**

Criteria

Antelope Valley Settlement Agreement, Subsection B, Complaint Classification, paragraph 130 (April 2015), states:

*... LASD shall investigate every allegation of misconduct that arises during an investigation even if an allegation is not specifically articulated as such by the complainant.*

Procedures

Auditors identified and reviewed 59 uses of force that occurred during the audit time period, two civil lawsuits, and three civil claims that were filed during the audit time period to determine whether allegations of misconduct were present and, if so, were documented in an SCR and investigated.

Of the 64 items reviewed, 56 were not allegations of misconduct. Therefore, the remaining eight were evaluated for this objective.

Results

All eight items (100%) met the criteria for this objective.

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**Objective No. 3 – Investigation**

**Objective No. 3(a) – Determine if the personnel complaints were thoroughly investigated, as required per the AV Agreement.**

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 131 (April 2015), states:

*All investigations of Antelope Valley personnel complaints, including reviews, shall be as thorough as necessary to reach reliable and complete findings. In each investigation, LASD shall consider all relevant evidence, including circumstantial, direct and physical evidence, as appropriate, and make credibility determinations based upon that evidence. There will be no automatic preference for a deputy’s statement over a non-deputy’s statement, nor will LASD disregard a witness’ statement merely because the witness has some connection to the complainant or because of any criminal history. LASD shall make efforts to resolve material inconsistencies between witness statements.*

Procedures

Auditors evaluated the 29 personnel SCR reviews (26 personnel complaints and three dual complaints), including related source documentation and audio/video files, to determine whether the personnel complaints were thoroughly investigated.

Results

All 29 SCR reviews (100%) met the criteria for this objective.

**Objective No. 3(b) – Determine if alleged incidents of misconduct were referred to the IAB or the Internal Criminal Investigations Bureau (ICIB).**

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 132 (April 2015), states:

*LASD agrees to continue to require station commanders in the Antelope Valley to refer alleged incidents of misconduct to the IAB or ICIB for further investigation or review...*

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Procedures

Auditors evaluated the 29 personnel SCR reviews, including related source documentation and audio/video files, to determine whether complaints required to be referred to IAB or ICIB were referred.

Of the 29 SCR reviews, 28 were not required to be referred to IAB or ICIB. Therefore, the remaining one SCR review was evaluated for this objective.

Results

The one SCR review (100%) met the criteria for this objective as the complaint was referred to IAB, as required.

**Objective No. 3(c) – If the case proceeds criminally, determine if the Division Chief reviewed the matter with the Unit Commander of IAB.**

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 132 (April 2015), states:

*... If the case proceeds criminally, the Division Chief over the Antelope Valley will review the matter with the unit commander of IAB to determine whether the administrative investigation may proceed on a parallel track. The Division Chief or unit commander of IAB may consult with the prosecuting agency for its input. If the matter proceeds on a parallel track, any compelled interview of the subject deputies may be delayed. The Division Chief shall document the reasons for the decision.*

Procedures

Auditors evaluated the 29 SCR reviews, including related source documentation and audio/video files, to determine if the case proceeded criminally, whether the Division Chief reviewed the matter with the Unit Commander of IAB.

Results

This objective is not applicable because none of the SCR reviews proceeded criminally.

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**Objective No. 3(d) – Ensure involved supervisor, or any supervisor who authorized the conduct that led to the personnel complaint, did not conduct the complaint investigation.**

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 133 (April 2015), states:

*LASD will not permit any involved supervisor, or any supervisor who authorized the conduct that led to the complaint, to conduct a complaint investigation.*

Procedures

Auditors evaluated the 29 personnel SCR reviews, including related source documentation and audio/video files, to ensure that for complaints where a supervisor was present at the time of the incident, the supervisor did not conduct the complaint investigation.

Of the 29 SCR reviews, 16 did not have a supervisor present at the time of the incident. Therefore, the remaining 13 were evaluated for this objective.

Results

All 13 SCR reviews (100%) met the criteria for this objective.

**Objective No. 3(e) – Ensure all persons at the scene giving rise to a misconduct allegation were identified.**

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 134 (April 2015), states:

*The misconduct investigator shall seek to identify all persons at the scene giving rise to a misconduct allegation, including all LASD deputies. The investigator shall note in the investigation report the identities of all deputies and other witnesses who were on the scene but assert they did not witness and were not involved in the incident...*

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Procedures

Auditors evaluated the 29 personnel SCR reviews, including related source documentation and audio/video files, to ensure all persons at the scene giving rise to a misconduct allegation were identified.

Results

Twenty-six of the 29 SCR reviews (90%) met the criteria for this objective. For the remaining three, witnesses present at the incident were not identified in the SCR.

**Objective No. 3(f) – Determine if the complainant, the involved employee, and all witnesses (including deputies) provided a written statement of the incident or were interviewed.**

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 135 (April 2015), states:

*All witnesses, including deputies witnessing or involved in an incident that becomes the subject of a personnel complaint, shall provide a written statement regarding the incident or be interviewed ...*

Procedures

Auditors evaluated the 29 personnel SCR reviews, including related source documentation and audio/video files, to determine whether the complainants, the involved employees, and all witnesses (including deputies) provided a written statement of the incident or were interviewed.

Results

All 29 SCR reviews (100%) met the criteria for this objective.

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**Objective No. 3(g) – Determine if complainant and non-deputy witness interviews were recorded in their entirety.**

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 136 (April 2015), states:

*... Interviews shall be recorded in their entirety, absent documented extraordinary circumstances.*

Procedures

Auditors evaluated the 29 personnel SCR reviews, including related source documentation and audio/video files, to determine whether complainant and witness (non-deputy) interviews were recorded in their entirety.

Of the 29 personnel SCR reviews, one SCR review did not have a recording of the interview because the complainant requested all communication be via e-mail; and two SCR reviews did not have interviews available because the individuals could not be reached. Therefore, the remaining 26 were evaluated for this objective.

Results

Twenty-three of the 26 SCR reviews (88%) met the criteria for this objective. For the remaining three, interviews were conducted but not recorded.

**Objective No. 3(h) – Determine if the complainant, the involved employee, and all witness (including deputy) interviews, were conducted separately.**

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 137 (April 2015), states:

*Consistent with current policy, interviews shall be conducted separately...*

Procedures

Auditors evaluated the 29 personnel SCR reviews, including related source documentation and audio/video files, to determine whether the complainants, the

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involved employees, and all witness (including deputy) interviews were conducted separately.

Results

Twenty-seven of the 29 SCR reviews (93%) met the criteria for this objective. For the remaining two, auditors could not determine if the interviews were conducted separately based on the available information.

**Objective No. 3(i) – Determine if interpreters used for LEP complainants or witnesses were not party to the complaint, if applicable.**

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 137 (April 2015), states:

*... An interpreter not involved in the underlying complaint will be used when taking statements or conducting interviews of any LEP complainant or witness.*

Procedures

Auditors evaluated the 29 personnel SCR reviews, including related source documentation and audio/video files, to determine whether interpreters used for LEP complainants or witnesses were not party to the complaint.

Results

This objective is not applicable because none of the complainants or witnesses were in need of an interpreter.

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A side by side comparison of the current and previous audit yielded the following results:

**Summary of Audit Results**

Objective No.	Audit Objectives	Met the Criteria	
		2019	2017 <sup>10</sup>
<b>1</b>	<b>COMPLAINT INTAKE</b>		
1(a)	<i>Availability of English complaint forms and informational materials.</i>	57%	50% <sup>11</sup>
1(b)	<i>Acceptance and review of all personnel complaints.</i>	100%	Not Evaluated
1(c)	<i>Availability of non-English language complaint forms and informational materials and/or translation services.</i>	100%	Not Evaluated <sup>12</sup>
1(d)	<i>Non-discouragement of filing a complaint.</i>	100%	100%
<b>2</b>	<b>COMPLAINT CLASSIFICATION</b>		
2(a)	<i>Revision of complaint investigation related policies.</i>	Not Applicable	Not Evaluated
2(b)	<i>Proper classification of service complaints.</i>	100%	96%
2(c)	<i>Appropriate classification of each allegation and personnel complaint.</i>	100%	100%
2(d)	<i>Investigation of all allegations of misconduct.</i>	100%	Not Evaluated
<b>3</b>	<b>INVESTIGATION</b>		
3(a)	<i>Thorough investigation of personnel complaints.</i>	100%	100%
3(b)	<i>Referral of alleged incidents of misconduct to IAB or ICIB.</i>	100%	Not Evaluated
3(c)	<i>Division Chief review of the matter with the unit commander of IAB if the case proceeded criminally.</i>	Not Applicable	Not Evaluated
3(d)	<i>Performance of complaint investigation by uninvolved supervisor.</i>	100%	100%
3(e)	<i>Identification of all persons at the scene.</i>	90%	100% <sup>13</sup>
3(f)	<i>Availability of written statement of the incident or interview of the complainant, involved employee, and all witnesses.</i>	100%	100%
3(g)	<i>Complainant and non-deputy witness interviews recorded in their entirety.</i>	88%	80%
3(h)	<i>Complainant, involved employee, and all witness interviews conducted separately.</i>	93%	100% <sup>14</sup>
3(i)	<i>Interpreter used for LEP complainants or witnesses was not party to the complaint.</i>	Not Applicable	Not Evaluated

<sup>10</sup> Results are from the previous audit, Public Comments Audit – Lancaster Sheriff’s Station, Project No. 2017-13-A, issued May 23, 2018. The footnotes below pertain to the previous audit.

<sup>11</sup> Availability of English and non-English complaint forms/informational materials were evaluated in 1(a).

<sup>12</sup> Translation services were not evaluated.

<sup>13</sup> Determining if all persons at the scene were identified was evaluated in 3(a).

<sup>14</sup> Determining if interviews were conducted separately was evaluated in 3(a).

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**OTHER RELATED MATTERS**

Other related matters are pertinent issues discovered during the audit.

Revisions of Complaint Investigation Related Policies

The auditors noted that the AV/DOJ Compliance Unit is responsible for the revisions of the complaint investigation related policies. Currently, the Department is not in compliance with the related provisions of the AV Agreement because the MPP 3-04 revisions are pending approval and the SCR Handbook and the IAB policy manual have not been revised.

**CONCLUSION**

The AAB auditors performed analyses and made assessments to identify areas that needed improvement. The results provide reasonable assurance that Department personnel are not adhering to all of the audited provisions in the AV Agreement as identified in the above-mentioned criteria.

**RECOMMENDATIONS**

When the AV Agreement is not adhered to, it may result in an increased risk to the Department. Department management should disseminate the results of this audit to its personnel.

The AAB considers the results of this audit to be a helpful management tool and therefore, makes the following recommendations:

1. It is recommended the Department conduct recurring and ongoing briefing to the Lancaster Sheriff’s Station of the AV Agreement provisions regarding availability of complaint informational materials to the public. (Objective No. 1)
2. It is recommended the Department conduct recurring and ongoing briefing to the Lancaster Sheriff’s Station of the AV Agreement provisions regarding identifying all persons at the scene; recording interviews in their entirety; and conducting interviews separately. (Objective No. 3)
3. It is recommended the Department revise the MPP 3-04, the SCR Handbook, and the IAB policy manual to clarify and strengthen requirements related to which inappropriate behavior by Department personnel would require discipline, as opposed to non-disciplinary action, and to address the misconduct.  
(Other Related Matters)

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**Views of Responsible Officials**

On December 10, 2019, North Patrol Division Command Staff submitted a formal response to AAB concurring with all audit results with exception to Objective No. 2(a), “Determine if complaint investigation related policies were revised, as required per the AV Agreement.” Management at North Patrol Division stated in their response to the report that the revision to the complaint investigation related policies are not within the purview of Lancaster Sheriff’s Station. After further discussion, auditors agreed that the audit result for this objective should reflect “Not Applicable.” Auditors had a subsequent discussion with AV/DOJ Compliance Unit who agreed with the changes made to the results. Auditors emphasized that the Department is required to comply with the related provisions of the AV Agreement and, therefore, auditors will continue to evaluate these provisions in future audits.

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This audit was submitted on this 7th day of January, by the Audit and Accountability Bureau.

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