

Los Angeles County Sheriff's Department

Audit and Accountability Bureau



Public Comments Audit

Patrol Operations - North

Patrol Division - Lancaster

Sheriff's Station

Audit No. 2020-3-A

August 25, 2020



Alex Villanueva, Sheriff

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

**PUBLIC COMMENTS AUDIT – PATROL OPERATIONS
NORTH PATROL DIVISION – LANCASTER SHERIFF'S STATION
Project No. 2020-3-A**

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's (Department) Lancaster Sheriff's Station adhered to the Manual of Policy and Procedures (MPP), Unit Orders, and the provisions of the United States Department of Justice (DOJ) Antelope Valley Settlement Agreement (AV Agreement)¹ regarding public comments, specifically service and personnel complaints documented on the Service Comment Report (SCR).²

The AAB conducted this audit under the guidance of Generally Accepted Government Auditing Standards.³ 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.⁴ Service complaints are external communications of dissatisfaction with Department service, procedures or practices, response times, traffic citations, 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.

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

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

³ United States Government Accountability Office, Government Auditing Standards, July 2018.

⁴ 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.⁵

PRIOR AUDITS

The AAB has conducted three 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 and 9 are still in progress. The second audit (Project No. 2017-13-A) included two recommendations, both are still in progress. The third audit (Project No. 2019-5-A) included three recommendations, of which one was implemented and two are in progress.

METHODOLOGY

Scope

The audit encompassed seven main objectives and included an evaluation of completed SCR reviews from the Lancaster Sheriff’s Station to ensure compliance with the MPP, Unit Orders, and the AV Agreement. For the purposes of this audit, an SCR review was considered completed when approved and signed by the division commander.

- Objective No. 1 – Complaint Intake: To determine if personnel complaint forms and informational materials are made available to the public as required; if complaints made were accepted and reviewed; 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.
- Objective No. 2 – Complaint Classification: To determine if personnel complaints were not classified as service complaints; if complaints were appropriately classified; and if allegations of misconduct were 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; if interviews were performed, conducted separately, and recorded in their entirety.

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

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- Objective No. 4 – Complaint Investigation Related Policies: To determine if complaint investigation related to policies were revised, as required per the AV Agreement.
- Objective No. 5 – Adjudication of a Service Comment Report: To determine whether the disposition of a SCR review was supported by sufficient information and relevant evidence.
- Objective No. 6 – Timeliness: To determine whether the SCR review was completed and forwarded to Division Headquarters within 30 days; if the SCR review was forwarded to the Discovery Unit within 60 days.
- Objective No. 7 – Accuracy of the SCR information in Performance Recording and Monitoring System (PRMS): To determine whether SCR information was entered accurately in PRMS.

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.⁶

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⁶ 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.

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Audit Time Period

Objective No. 1(a), auditors visited the six properties and the Department’s website on February 18, 2020.

Objectives Nos. 1(b), 1(c), 1(d), 2(a), 2(b), 3, 4, 5, 6 and 7, the audit time period was from September 1, 2019, through November 30, 2019.

Objective No. 2(c), the audit time period was from September 1, 2019, through December 31, 2019.

Auditors utilized different audit time periods in order to examine the different aspects of the seven main objectives.

Audit Population

All documented service and personnel complaints generated by the public against personnel from the Lancaster Sheriff’s Station, which were fully investigated with final approval by a commander at the division level, were included in the population. Twenty SCR reviews were identified from the data sources for the audit time period. Of the 20 SCR reviews, 15 were personnel complaints, two were service complaints, and three were dual (personnel and service) complaints.

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

All use of force incidents and civil claims used in objective No. 2(c) were identified through the PRMS, Force Module and Claim Module. These items were cross referenced with entries in the Station/Bureau Administration Portal (SBAP).

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

⁷ 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.

⁸ 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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AUDIT DETAILS AND RESULTS

Objective No. 1 – Complaint Intake

Objective No. 1(a) – Determine if Personnel Complaint Forms and Informational Materials are Made Available to the Public, as Required.

Criteria

Manual of Policy and Procedures, Section 3-04/010.35, Public Accessibility to Information About the Complaint Process (October 2014), states:

Each Bureau, Station and facility shall maintain a supply of the Department forms SH-CR-596 and SH-CR-596A (Spanish version). These forms, entitled "Procedures For Public Complaints," explain how the Department conducts complaint inquiries. The forms also inform the public of their recourse in the event of dissatisfaction after a complaint is handled...

Lancaster Sheriff’s Station Unit Order Number 69, Supplemental Supervisory Responsibilities (August 2019), Community Complaints, states:

Any Limited English Proficient (LEP) individual who wishes to file a complaint about a 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.

The Community Relations sergeant shall ensure the following locations have ample stock of complaint forms in both English and Spanish:

- *Lancaster Station Lobby*
- *Lake Los Angeles Library*
- *Lancaster Library*
- *Quartz Hill Library*
- *Michael Antonovich Antelope Valley Courthouse (Inside the Sheriff’s office)*
- *Antelope Valley Juvenile Court (Inside the Sheriff’s office)*

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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.

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

On February 18, 2020, auditors visited the six properties and the Department’s website to determine whether English and Spanish personnel complaint forms and informational materials and/or translation services were available to LEP individuals.

Results

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

The Antelope Valley Juvenile Court did not have informational posters displayed. However, Lancaster Sheriff’s Station documented they made reasonable efforts to ensure the complaint material was readily available at the location. The Lancaster Sheriff’s Station personnel informed auditors, the Antelope Valley Juvenile Court was undergoing remodeling efforts to their display cases during time of site visit. The Antelope Valley Juvenile Court utilizes their display cases to post information posters.

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Objective No. 1(b) – Determine if Complaints Made through the Dispatch Center were Accepted and Reviewed.

Criteria

Manual of Policy and Procedures, Section 3-04/010.00, Department Service Reviews (December 2013), states:

The Department will accept and review any comment from any member of the public concerning Departmental service or individual performance

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

Auditors obtained and examined weekend dispatch call segments to determine whether incoming telephone call complaints are accepted. During the week, calls made by members of the public who wish to make a complaint at Lancaster Sheriff’s Station are answered by the station telephone operators. These lines are not recorded. During the weekend, complaint calls made to the Lancaster Sheriff’s Station are answered by the station dispatch center, which are on recorded lines. Auditors selected a population of weekend dispatch line call segments for review.

Auditors identified a total of 4,203 inbound dispatch telephone call segments made during all weekends for the month of September 2019 at the Lancaster Sheriff’s Station. Auditors reviewed the Voice Print International (VPI) system to obtain the data. A statistically valid random sample⁹ of 94 call segments was selected to determine whether all complaints were accepted and reviewed during their initiation. Of the 94 call segments, 93 were not complaints. The remaining call segment was a complaint and was evaluated for this objective.

⁹ 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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Results

The complaint call (100%) met the criteria for this objective. The caller was transferred to the watch commander when the complaint was made in order to proceed with the complaint process.

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Objective No. 1(c) – Determine if Complaints Made to the Watch Commander’s telephone line were Accepted and Reviewed.

Criteria

Manual of Policy and Procedures, Section 3-04/010.00, Department Service Reviews (December 2013), states:

The Department will accept and review any comment from any member of the public concerning Departmental service or individual performance.

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

When complainants call the Lancaster Sheriff’s Station, their initial point of contact is either a station telephone operator during the week or a dispatcher during the weekend. Complainants are then forwarded to the watch commander. The watch commander’s line is a recorded telephone line.

Auditors identified a total 132 inbound watch commander telephone call segments from the VPI system. Auditors listened to and evaluated all 132 call segments to determine if complaints were made and accepted by the watch commander at the Lancaster Sheriff’s Station during the month of September 2019. Of the 132 call segments, 131 were not complaints. The remaining call segment was a complaint, and was evaluated for this objective.

Results

The complaint call (100%) met the criteria for this objective. The caller wanted to file a complaint, resulting in an SCR.

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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

Lancaster Station Unit Order Number 69, Supplemental Supervisory Responsibilities (August 2019), Community Complaints, 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.

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.

Procedures

Auditors evaluated the 20 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.

Of the 20 SCR reviews, ten were not received by Lancaster Sheriff’s Station and were excluded from this objective. Therefore, the remaining 10 SCR reviews were evaluated for this objective.

Results

All ten SCR reviews (100%) met the criteria for this objective. All ten SCR reviews were submitted without discouraging the complainant or providing false or misleading information.

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The table below summarizes the filing locations for all the SCR reviews.

Table No. 1 – Complaint Filing Location

Complaint Received By	Number of SCRs
Lancaster Sheriff’s Station	10
Another Sheriff’s Station (not Lancaster)	1
Internal Affairs Bureau	5
North Patrol Division	1
Office of Inspector General	3
TOTAL	20

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Objective No. 2 – Complaint Classification

Objective No. 2(a) – Determine if Personnel Complaints Were Not Classified as Service Complaints.

Criteria

Manual of Policy and Procedures, Section 3-04/010.00, Department Service Reviews (December 2013), states:

The Department will accept and review any comment from any member of the Public concerning Departmental service or individual performance...

- *Service Complaint: an external communication of dissatisfaction with Department service, procedure or practice, not involving employee misconduct; and*
- *Personnel Complaint: an external allegation of misconduct, either a violation of law or Department policy, against any*

Lancaster Station Unit Order Number 69, Supplemental Supervisory Responsibilities (August 2019), Community Complaints, states:

Supervisors shall ensure that personnel complaints are not misclassified as service complaints.

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

Results

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

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Objective No. 2(b) – Determine Whether Complaint was Appropriately Classified.

Criteria

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

The watch commander shall place a mark in the appropriate box indicating the nature of the comment, and shall mark the appropriate sub-category(s) as accurately as possible.

Manual of Policy and Procedures, Section 3-04/010.25, Personnel Complaints (October 2014), states:

The watch commander shall also check the fact page of the Service Comment form and ensure that it is filled out completely and correctly. He shall confirm that the proper categories are marked reflecting the nature of the complaint...

Lancaster Station Unit Order Number 69, Supplemental Supervisory Responsibilities (August 2019), Community Complaints, states:

Supervisors shall ensure that that all personnel complaint allegations are accurately classified at all investigative stages, from intake through resolution....

Antelope Valley Settlement Agreement, 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 20 SCR reviews, including their related source materials to determine whether the complaints were appropriately classified during the initial intake, or if not, were later modified to reflect the correct classification.

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Results

All twenty (100%) SCR reviews were appropriately classified during intake or were later modified to reflect the correct classification. Seventeen of the 20 SCR reviews were classified correctly during intake. Three of the 20 SCR reviews were later modified to the correct classification after additional information was received by the station.

The table below summarizes the three SCR review classification modifications.

Table No. 2 – Modified Classifications

Initial Classification	Final Classification
Personnel Complaint	Service Complaint
Service Complaint	Dual Complaint
Dual Complaint	Personnel Complaint

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Objective No. 2(c) – Determine if all Allegations of Misconduct were Investigated.

Criteria

Lancaster Station Unit Order Number 69, Supplemental Supervisory Responsibilities (August 2019), Community Complaints, states:

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

Antelope Valley Settlement Agreement, 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 68 use of force incidents that occurred during the audit time period and 12 additional civil claims that were filed during the audit time period to determine whether allegations of misconduct were present and, if so, that they were documented and in an SCR and investigated.

Of the 80 items reviewed, 76 were not allegations of misconduct. Therefore, the remaining four items were evaluated for this objective.

Results

One (25%) of the four items met the criteria for this objective. The allegation of unreasonable force was documented in an SCR and investigated.

Three of the four items included allegations of discourtesy that arose during use of force investigations. Two of the three allegations of discourtesy were investigated in the use of force investigations. However, none of the three allegations of discourtesy were documented in an SCR.

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Objective No. 3 – Investigations

Objective No. 3(a) – Determine if the Personnel Complaints were Thoroughly Investigated, as required.

Criteria

Lancaster Station Unit Order Number 69, Supplemental Supervisory Responsibilities (August 2019), Community Complaints, states:

All investigations of personnel complaints, including reviews, shall be as thorough as necessary to reach reliable, objective, and complete findings. In each investigation, supervisors 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 supervisors disregard a witness’ statement merely because the witness has some connection to the complainant or because of any criminal history. Supervisors shall fully investigate each complaint, and make efforts to resolve any material inconsistencies between witness statements and/or the statements of deputies.

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.

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Procedures

Auditors examined the 20 SCR reviews to determine whether the complaints were thoroughly investigated. Two of the SCR reviews were excluded from this objective because they were service complaints. Therefore, auditors evaluated 18 personnel SCR reviews (15 personnel complaints and three dual complaints) for this objective.

Auditors reviewed source documentation narratives, interviews, correspondence, and audio/video files. Auditors conducted a qualitative assessment of those documents as to whether supervisors documented and considered all relevant evidence as appropriate. This included determining whether or not all potential parties were contacted, interviews were recorded, and all involved Department personnel were identified and interviewed.

Results

All 18 personnel SCR reviews (100%) met the criteria for this objective.

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Objective No. 3(b) – Determine if Alleged Incidents of Misconduct were Referred to Internal Affairs Bureau (IAB) or Internal Criminal Investigations Bureau (ICIB).

Criteria

Manual of Policy and Procedures, Section 3-04/010.25, Personnel Complaints (October 2014), states:

The concerned Unit Commander is responsible for evaluating each personnel complaint to determine the appropriate supervisory response. The nature and seriousness of the allegation(s), the potential for employee discipline, and the concerned employee’s performance history are potential factors to consider in the evaluation. Generally, the following courses of action are options:

- *request that ICIB conduct a criminal investigation if there is reason to believe a crime has been committed. The request may be sent via e-mail from the concerned Division Chief or Division Director directly to the Captain of ICIB. (Use Exchange Group, “ICIB Investigation Request.”);*
- *request that IAB conduct an administrative investigation. The request may be sent via e-mail from the concerned Division Chief or Division Director directly to the Captain of IAB. (Use Exchange Group, “IAB Investigation Request.”);*
- *conduct a Unit level administrative investigation; and*
- *initiate a service review.*

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...

Procedures

Auditors evaluated the 20 SCR reviews, including their related source materials to determine whether complaints required to be referred to IAB or ICIB were referred. Of the 20 SCR reviews, two were excluded because they were service complaints.

Of the 18 personnel SCR reviews, 16 were not required to be referred to IAB or ICIB. Therefore, the remaining two personnel SCR reviews were evaluated for this objective.

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Results

The two personnel SCR reviews (100%) met the criteria for this objective as the complaints were referred to the IAB, as required.

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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 20 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. Of the 20 SCR reviews, two were excluded because they were service complaints.

Of the 18 personnel SCR reviews, 16 were not referred to IAB or ICIB. Therefore, the remaining two personnel SCR reviews were evaluated for this objective.

Results

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

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Objective No. 3(d) – Ensure Supervisor who Conducted SCR Investigation was Not an Involved Supervisor, or any Supervisor who Authorized the Conduct that Led to the Complaint.

Criteria

Lancaster Station Unit Order Number 69, Supplemental Supervisory Responsibilities (August 2019), Community Complaints, states:

Any involved supervisor who is party to the complaint, or any supervisor who authorized the conduct that led to a complaint, shall not conduct the complaint investigation.

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 20 SCR reviews, including their related source materials, to determine whether the supervisor who conducted the SCR investigation was not an involved supervisor or any supervisor who authorized the conduct that led to the complaint unless sufficient justification is documented in the SCR investigation.

Results

All of the 20 SCR reviews (100%) met the criteria for this objective.

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Objective No. 3(e) – Ensure all Persons at the Scene Giving Rise to a Misconduct Allegation were Identified.

Criteria

Lancaster Station Unit Order Number 69, Supplemental Supervisory Responsibilities (August 2019), Community Complaints, states:

Supervisors shall seek to identify all persons at the scene giving rise to a misconduct allegation, including all deputies. The supervisor shall note in the investigative 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.

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...

Procedures

Auditors evaluated the 20 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

Nineteen of the 20 SCR reviews (95%) met the criteria for this objective. One SCR review had deputy witnesses present at an incident that were not identified.

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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

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

The watch commander of the Unit shall initiate a service review by immediately interviewing any member of the public who, whether in person or by telephone, offers a comment.

Lancaster Station Unit Order Number 69, Supplemental Supervisory Responsibilities (August 2019), Community Complaints, states:

Supervisors shall interview each complainant in person, if practical, and will conduct additional interviews as necessary to reach reliable and complete findings. If an interview is not conducted in person, the reason shall be articulated in the complaint memorandum.

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 ...

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

The SCR complaint investigator shall interview each complainant in person, if practical...

Procedures

Auditors evaluated the 20 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.

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Results

Nineteen of the twenty SCR reviews (95%) met the criteria for this objective. For the remaining SCR review, deputy witnesses present at the incident were not identified in the SCR, and therefore were not interviewed.

It should be noted, two of the twenty SCR reviews did not interview the complainant. However, sufficient justification is documented in the SCR investigation as to why Lancaster Sheriff’s Station personnel did not or could not interview complainant.

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Objective No. 3(g) – Determine if Complainant and Non-Deputy Witness Interviews were Recorded in Their Entirety.

Criteria

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

During telephonic comments or complaints, the watch commander shall field the call on a taped line if equipment is in place to do so ...

Lancaster Station Unit Order Number 69, Supplemental Supervisory Responsibilities (August 2019), Community Complaints, states:

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

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

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

Procedures

Auditors evaluated the 20 SCR reviews, including related source materials, to determine whether complainant and witness (non-deputy) interviews were recorded in their entirety, absent documented extraordinary circumstances.

Of the 20 SCR reviews, one SCR review did not have complainant interviews or civilian witness interviews because the Lancaster Sheriff’s Station was either unable to contact them after multiple attempts or they refused to be recorded.

Therefore, 19 SCR reviews were evaluated for this objective.

Results

All 19 SCR reviews (100%) met the criteria for this objective.

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Objective No. 3(h) – Determine if the Complainant, the Involved Employee, and all Witness (Including Deputy) Interviews, were Conducted Separately.

Criteria

Lancaster Station Unit Order Number 69, Supplemental Supervisory Responsibilities (August 2019), Community Complaints, states:

During the complaint process, it shall be documented that each complainant, witness and involved employee were interviewed separately.

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 20 SCR reviews, including related source materials, to determine whether the complainants, the involved employee, and all witness (including deputy) interviews were conducted separately.

Of the 20 SCR reviews, two did not have interviews available because the complainants could not be reached or refused to be interviewed. However, these SCR reviews contained interviews for witnesses, deputy witnesses, and involved employees which were assessed in this objective.

Results

Nineteen of the 20 SCR reviews (95%) met the criteria for this objective. One SCR review did not document whether the involved employee and Department witness were interviewed separately.

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Objective No. 3(i) – Determine if Interpreters Used for LEP Complainants or Witnesses were Party to the Complaint, if Applicable.

Criteria

Lancaster Station Unit Order Number 69, Supplemental Supervisory Responsibilities (August 2019), Community Complaints, states:

Supervisors shall not use department personnel who are party to the complaint as an interpreter for LEP complainants or witnesses.

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 20 SCR reviews, including related source materials, to determine whether interpreters used for LEP complainants or witnesses were party to the complaint.

Results

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

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Objective No. 4 – Complaint Investigation Related Policies

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. 5 – Adjudication of a Service Comment Report

Criteria

Service Comment Report Handbook, Section III, Adjudication of an SCR (June 2011), states:

*...Service reviews should be concise yet need to include sufficient information in order for the **Unit Commander** to make an appropriate assessment. The review should be objective and each allegation should be thoroughly addressed. During the adjudication stage, it is the responsibility of the Unit Commander to ensure that the recommended disposition is supported by the statements and evidence...*

C. Adjudication of an SCR:

*If the complaint is handled as a service review, then the **Unit Commander** is responsible for approving the recommended review disposition. The service review must contain sufficient information in order for the Unit Commander to make a final determination and that determination must be supported by the information contained in the review...*

*...The **Unit Commander** should use neutral and objective criteria, weigh evidence appropriately to distinguish strong evidence from questionable or less material evidence, and not indulge in presumptions that bias the findings...*

2). REVIEW DISPOSITION:

- c). **Review Completed - Service Only - No Further Action:** (Used only when a complaint is categorized as a “Service Complaint.”)
- d). **Employee Conduct Appears Reasonable:** (Review indicated the employee’s actions appear to be in compliance with procedures, policies, guidelines or training.)
- e). **Appears Employee Conduct Could Have Been Better:** (The employee’s actions were in compliance with procedures, policies, and guidelines. The complaint could have been minimized if the employee had employed tactical communication principles or common sense.)

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- f). **Employee Conduct Should Have Been Different:** *(The employee’s actions were not in compliance with established procedures, policies, guidelines or training. **Watch Commander** will take appropriate action.)*
- g). **Unable to Make a Determination:** *(The review revealed insufficient information to assess the employee’s alleged conduct or to identify the employees involved.)*
- h). **Resolved - Conflict Resolution Meeting:** *(A conflict resolution meeting with the reporting party and involved employee(s) was held. The meeting adequately addressed all concerns and no further actions are deemed necessary.)*

Antelope Valley Settlement Agreement, Subsection E, Personnel Complaint Audits, paragraph 140 (April 2015), states:

LASD shall conduct a semiannual, randomized audit of LASD-AV’s complaint intake, classification, and investigations. This audit will assess whether complaints are accepted and classified consistent with policy, investigations are complete, and complaint dispositions are consistent with a preponderance of the evidence.

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

...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

The adjudication of an SCR is documented on the *Result of Service Comment Review* form and is evidenced by the Unit Commander’s signature attesting he/she agreed with the recommended disposition made by the supervisor completing the investigation. Auditors examined the SCR reviews to determine whether the disposition was supported by sufficient information and relevant evidence contained in the review. This included assessing whether automatic preference for a deputy’s statement was given over a non-deputy’s statement.

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Results

All 20 (100%) SCR reviews met the criteria for this objective.

Table No. 3 represents the dispositions for the SCRs reviewed. The total number does not equal the number of SCRs in the audit because multiple Department members may have been involved in a single complaint requiring a separate disposition for each member.

Table No. 3 - Result of Service Comment Review

Review Disposition	Number of Disposition
Review Completed – Service Only	5
Employee Conduct Appears Reasonable	17
Appears Employee Conduct Could Have Been Better	0
Employee Conduct Should Have Been Different	3
Unable to Make a Determination	1
Resolved – Conflict Resolution Meeting	0
Unit Level Administrative Investigation Initiated	0
Exoneration	1

Auditors noted that in the one Personnel Complaint SCR with a disposition of “Exoneration,” the division chief signed the *Result of Service Comment Review* form attesting his approval of the disposition.¹⁰

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¹⁰ MPP §3-04/010.25, Personnel Complaints, October 2014, states the concerned division chief shall review and approve all service reviews which result in an exoneration finding.

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Objective No. 6 – Timeliness

Objective No. 6(a) – Timely Completion of the SCR Review.

Criteria

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

NOTE: Watch Commander Service Comment Reports shall be completed within 30 calendar days...

Service Comment Report Handbook, Section III, Subsection A(1), Due Dates (June 2011), states:

Service reviews shall be completed within 30 calendar days...

Procedures

Auditors examined the 20 SCR reviews for their complaint intake dates and the dates the unit commander signed the SCR reviews to determine whether they were completed within 30 calendar days.

Results

None (0%) of the SCR reviews met the criteria for this objective.

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The table below summarizes the duration for the SCR reviews to be completed at the unit level.

Table No. 4 - Timely Completion of the SCR Reviews

Number of Days for SCR review to be completed	
0-30 Days	0
31-40 Days	0
41-50 Days	0
51-60 Days	1
61-70 Days	0
71-80 Days	3
81-90 Days	4
91-100 Days	5
100+ Days	7
TOTAL	20

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Objective No. 6(b) – SCR Review Forward to Division Headquarters.

Criteria

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

NOTE: Watch Commander Service Comment Reports shall be completed within 30 calendar days and forwarded to Division.

Service Comment Report Handbook, Section III, Subsection A(1), Due Dates (June 2011), states:

Service reviews shall be completed within 30 calendar days and forwarded to Division.

Procedures

Auditors examined the 20 SCR reviews for their complaint intake date and the date Division Headquarters time stamped the received SCR review to determine whether the SCR review was forwarded to Division Headquarters within 30 days.

Results

None (0%) of the SCR reviews met the criteria for this objective.

The table below summarizes the duration in days for the SCR reviews to be forwarded to Division Headquarters.

Table No. 5 – SCR Reviews Forwarded to Division Headquarters

Number of Days for SCR review to be forwarded to Division	
0-30 Days	0
31-40 Days	0
41-50 Days	0
51-60 Days	0
61-70 Days	1
71-80 Days	1
81-90 Days	5
91-100 Days	4
100+ Days	9
TOTAL	20

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Objective No. 6(c) – Completed SCR Review Forwarded to Discovery Unit.

Criteria

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

Unit commanders shall ensure that the Service Comment Report is completed and forwarded to the Discovery Unit within 60 days of receipt of the initial complaint.

Service Comment Report Handbook, Section III, Subsection A(1), Due Dates (June 2011), states:

The completed SCR package shall be forwarded to the Discovery Unit within 60 calendar days...

Procedures

Auditors examined the 20 SCR reviews for their complaint intake date and the PRMS for the Discovery Unit’s received date to determine whether the SCR review was forwarded to the Discovery Unit within 60 days.

Results

None (0%) of the SCR reviews met the criteria for this objective.

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The table below summarizes the duration in days for the completed SCR reviews to be forwarded to the Discovery Unit.

Table No. 6 – Completed SCR Reviews Forwarded to Discovery Unit

Number of Days for Completed SCR review to be forwarded to Discovery Unit	
0-60 Days	0
61-70 Days	0
71-80 Days	1
81-90 Days	0
91-100 Days	2
101-110 Days	8
111-120 Days	5
121-130 Days	2
130+ Days	2
TOTAL	20

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Objective No. 7 – Accuracy of the SCR Review Information in PRMS

Criteria

Antelope Valley Settlement Agreement, Subsection A, Personnel Performance Index, paragraph 142 (April 2015), states:

LASD-AV will ensure that PPI [now PRMS] data is accurate and hold responsible Antelope Valley personnel accountable for inaccuracies in any data entered.

Population

Auditors examined the 20 SCR reviews and their entries in PRMS to determine whether information was accurately entered in PRMS.

Results

Nineteen of the 20 (95%) SCR reviews met the criteria for this objective. One of the SCR review entries in PRMS had an incorrect report date.

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SUMMARY OF AUDIT RESULTS

The audit yielded the following results:

Table No. 7 - Summary of Audit Results

Objective No.	Audit Objectives	Met the Criteria	
		2020	2019 ¹¹
1	COMPLAINT INTAKE		
(a)	Availability of complaint forms and informational materials.	100%	57%
1(b)	Acceptance and review of all complaints – Dispatch Calls.	100%	Not Evaluated
1(c)	Acceptance and review of all complaints – Watch Commander Calls.	100%	100%
1(d)	Non-discouragement of filing a complaint.	100%	100%
2	COMPLAINT CLASSIFICATION		
2(a)	Proper classification of service complaints.	100%	100%
2(b)	Appropriate classification of complaint.	100%	100%
2(c)	Investigation of all allegations of misconduct.	25%	100%
3	INVESTIGATION		
3(a)	Thorough investigation of complaints.	100%	100%
3(b)	Referral of alleged incidents of misconduct to IAB or ICIB.	100%	100%
3(c)	Division Chief review of the matter with the unit commander of IAB if the case proceeded criminally.	Not Applicable	Not Applicable
3(d)	Performance of complaint investigation by uninvolved supervisor.	100%	100%
3(e)	Identification of all persons at the scene.	95%	90%
3(f)	Availability of written statement of the incident or interview of the complainant, involved employee, and all witnesses.	95%	100%
3(g)	Complainant and non-deputy witness interviews recorded in their entirety.	100%	88%
3(h)	Complainant, involved employee, and all witness interviews conducted separately.	95%	93%
3(i)	Interpreter used for LEP complainants or witnesses was not party to the complaint.	Not Applicable	Not Applicable
4	COMPLAINT INVESTIGATION RELATED POLICIES		
	Revision of complaint investigation related policies.	Not Applicable	Not Applicable
5	ADJUDICATION OF A SERVICE COMMENT REPORT		
	Adjudication of a Service Comment Report	100%	Not Evaluated
6	TIMELINESS		
6(a)	Timely Completion of the SCR Review.	0%	Not Evaluated
6(b)	SCR Review forwarded to Division Headquarters.	0%	Not Evaluated
6(c)	Completed SCR Review forwarded to Discovery Unit.	0%	Not Evaluated
7	ACCURACY OF SCR REVIEW INFORMATION IN PRMS		
	Accuracy of the SCR review information in PRMS	95%	Not Evaluated

¹¹ Results are from the previous audit, Public Comments Audit – Lancaster Sheriff’s Station, Project No. 2019-5-A, issued January 7, 2019.

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OTHER RELATED MATTERS

Other related matters are pertinent issues discovered during the audit, but were not objectives which were measurable against Department policies and procedures.

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 AAB considers the results of this audit to be a helpful management tool for all Department personnel. The evidence presented provides reasonable assurance that Department personnel are not adhering to policies and procedures and audited provisions in the AV Agreement as identified in the above-mentioned criteria.

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RECOMMENDATIONS

When Departmental policies and procedures and the AV Agreement are 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. Additionally, as best practice, Department management is encouraged to conduct recurring and ongoing briefing of policies and procedures. The AAB considers the results of this audit to be a helpful management tool and therefore, makes the following recommendations:

The AAB makes the following recommendations:

1. It is recommended the Department evaluate whether the current SCR Timeline – Summary of Due Dates in the SCR Handbook are feasible for SCR Reviews. (Objective No. 6)
2. To ensure the accuracy of the SCR information in PRMS, is recommended that Lancaster Sheriff’s Station personnel put in place procedures to ensure proper data entries and documentation. (Objective No. 7)

Views of Responsible Officials

On August 18, 2020, North Patrol Division Command Staff submitted a formal response to AAB concurring with the audit results.

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This audit was submitted on this 25th day of August 2020, by the Audit and Accountability Bureau. A copy of the audit report was provided to the Office of Inspector General.

Original signature on file at AAB

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