

Los Angeles County Sheriff's Department

Audit and Accountability Bureau



Alex Villanueva, Sheriff

INMATE GRIEVANCES AGAINST STAFF AUDIT

CUSTODY SERVICES DIVISION –
GENERAL POPULATION –
NORTH COUNTY
CORRECTIONAL FACILITY

Project No. 2021-6-A

October 26, 2021

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT
Audit and Accountability Bureau

INMATE GRIEVANCES AGAINST STAFF AUDIT
CUSTODY SERVICES DIVISION – GENERAL POPULATION
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PURPOSE

The Audit and Accountability Bureau (AAB) conducted the Inmate Grievances Against Staff Audit – North County Correctional Facility (NCCF) 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) complied with the policies and procedures related to the processing, inquiry, and response to inmate grievances against staff. This audit satisfied, in part, the recommendations of the Citizens' Commission on Jail Violence (CCJV) and provisions related to the implementation plan of the *Rosas Settlement Agreement* (Agreement).¹

The AAB conducted this audit under the guidance of the Generally Accepted Government Auditing Standards.² The AAB determined the evidence obtained was sufficient and appropriate to provide a reasonable assurance for results based on the audit objectives.

BACKGROUND

In 2012, the Los Angeles County Board of Supervisors, responded to the *Rosas* federal class action lawsuit alleging the Department condoned a long-standing and widespread pattern of violence by deputies against inmates in the jails. The CCJV was convened to investigate these allegations. The civil action resulted in the Agreement and implementation plan which included recommendations addressing training, reporting, and tracking incidents involving uses of force as well as inmate requests and grievances. Prior to the Agreement, the Department collected, tracked, and addressed inmate grievances in a manner found to be insufficient by the CCJV.

As a result of the Agreement's recommendations, the Department's Inmate Grievance policy was revised resulting the creation of Volume 8 of the Department's Custody Division Manual (CDM).³

¹ On September 26, 2014, the Sheriff of Los Angeles County entered into a Settlement Agreement regarding *Alex Rosas, et al. v. Leroy D. Baca*, Case No. CV 12-00428 DDP.

² United States Government Accountability Office, Government Auditing Standards, July 2018.

³ The CDM, Section 8-01/000.000, Preamble to the Inmate Grievance Policy (Non-Medical/Non-Mental Health), (July 2016), states the purpose of the inmate grievance policy is to establish and maintain a fair, objective and effective grievance process through which resolutions of inmate grievances are achieved at the lowest possible administrative level with timely responses to the aggrieved, and affording reasonable opportunities to appeal to the next level of review.

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PRIOR AUDITS

This is the first Inmate Grievances Against Staff Audit conducted at the NCCF.

METHODOLOGY

Scope

This audit encompassed five main objectives for both emergency and non-emergency inmate grievances against staff:

- Objective No. 1 - Supervisor Responsibilities - To determine if the inmate grievance against staff alleging retaliation was documented on a memorandum to the respective division chief; if the grievance alleging a use of force led to a use of force investigation; if the grievance was assigned to a sergeant, who was not the employee against whom the grievance was directed nor the employee's direct supervisor.
- Objective No. 2 - Investigation - To determine if the aggrieved inmate interview was documented via audio or video in a private area (i.e. retaliation, use of force); if the grievance against staff rose to the level of an administrative or criminal investigation.
- Objective No. 3 - Notification to the Aggrieved Inmate - To determine if a written response was given to the aggrieved inmate within the mandatory time frame (15 calendar days from receipt); if aggrieved inmate was notified of the results of the investigation, within ten calendar days of the unit commander's approval of the disposition.
- Objective No. 4 - Inmate Grievance Package was forwarded to the Discovery Unit - To determine if the completed grievance was forwarded to the Discovery Unit, within 60 days with the exception of force, Internal Affairs or Internal Criminal Investigations Bureau investigations.
- Objective No. 5 - Appeal of Grievances Against Staff - To determine if an uninvolved area Commander performed the first level appeal and if the aggrieved inmate was notified in 15 days whether the first level appeal was upheld or denied; if second level appeal was reviewed by the respective division chief and if the aggrieved inmate was notified in 15 days, whether the second level appeal was upheld or denied.

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Audit Time Period

The audit time period was August 1, 2020, through October 31, 2020.

Audit Population

Auditors identified a total of 18 inmate grievances against staff within the audit time period. One grievance was excluded from the testing population because it was still in-progress. A total of 17 inmate grievances against staff were evaluated to examine the different aspects of the five main objectives, which are described in the Audit Objectives and Results section of this report.

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AUDIT OBJECTIVES AND RESULTS

Objective No. 1 - Supervisor Responsibilities

Objective No. 1(a) – To Determine if the Inmate Grievance Against Staff Alleging Retaliation was Documented on a Memorandum to the Respective Division Chief.

Criteria

Custody Division Manual, Section 8-03/050.00, Grievances of Retaliation (November 2018), states:

Upon receipt of an inmate grievance alleging retaliation, the watch commander shall conduct a preliminary assessment as to the nature of the allegation, ensure it is entered into the Custody Automated Reporting and Tracking System (CARTS), and document the allegation on a memorandum to the respective division chief, which shall be submitted to the unit commander of the involved facility for review...

Procedures

Auditors reviewed the 17 grievances against staff to determine if the grievances alleged retaliation. Fourteen grievances were excluded from this objective because they did not allege retaliation. Three grievances were evaluated for this objective. Auditors reviewed the grievance documentation in the NCCF shared folders and CARTS system to determine if the grievances alleging retaliation were documented on a memorandum to the respective division chief.

Results

Two of the three (67%) grievances met the criteria for this objective. One of the grievances did not meet the criteria because auditors could not locate a memorandum to the respective division chief.

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Objective No. 1(b) – To Determine if the Inmate Grievance Against Staff Alleging a Use of Force Led to a Use of Force Investigation.

Criteria

Custody Division Manual, Section 8-03/040.00, Grievances Against Staff (October 2018), states:

All inmate grievances involving allegations of force shall be entered into the electronic Line Operations Tracking System (e-LOTS) prior to the end of the shift in which the incident occurred or the allegation is received, tracked under Project Type "Alleged Use of Force" (refer to CDM section 4-01/025.05, "Electronic Line Operations Tracking System (e-LOTS)," and shall be investigated and resolved in accordance with the Department's existing use of force policies.

Audit Procedures

Auditors reviewed the 17 grievances against staff to determine if the grievances alleged a use of force incident. Fifteen grievances were excluded from this objective because they did not allege a use of force incident. Two grievances were evaluated for this objective. Auditors reviewed the grievance documentation in the NCCF shared folders and CARTS system to determine if a use of force investigation was initiated.

Results

Both (100%) grievances met the criteria for this objective.

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Objective No. 1(c) – To Determine if the Inmate Grievance Against Staff was Assigned to a Sergeant, Who was not the Employee Against Whom the Grievance was Directed nor the Employee’s Direct Supervisor.

Criteria

Custody Division Manual, Section 8-03/040.00, Grievances Against Staff (October 2018), states:

SUPERVISOR RESPONSIBILITIES

...The watch commander, or other facility lieutenant, shall assign the grievance to a supervisor with the permanent rank of sergeant or above, who is not the employee against whom the grievance is directed, nor the employee’s direct supervisor...

Procedures

Auditors reviewed the 17 grievances against staff to determine if the grievances were assigned to a sergeant, who was not the employee against whom the grievance was directed nor the employee’s direct supervisor. Auditors reviewed the grievance memorandums and shift in-services to determine if the grievances were assigned to a sergeant, in accordance with Department policy.

Results

Eleven of the 17 (65%) grievances met the criteria for this objective. Six grievances did not meet the criteria because they were investigated by sergeants who supervised the involved employee on the day of the incident.

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Objective No. 2 - Investigation

Objective No. 2(a) – To Determine if the Aggrieved Inmate Interview was Documented via Audio or Video in a Private Area.

Criteria

Custody Division Manual, Section 8-03/040.00, Grievances Against Staff (October 2018), states:

SUPERVISOR RESPONSIBILITIES

The assigned supervisor shall initiate a comprehensive inquiry which shall include interviewing the aggrieved inmate and gathering any relevant documents and/or evidence. It is important the comprehensive inquiry be conducted as soon as practicable to capture information and/or evidence while it is still fresh and/or available. An interview of the aggrieved inmate shall be conducted in a private area, and shall be recorded using either audio or video media, as part of the inquiry of any grievance against staff with a serious allegation (e.g., use of force, retaliation, etc.), or at the watch commander's discretion.

Procedures

Auditors reviewed the 17 grievances against staff to determine if the aggrieved inmate interviews were documented via audio or video. Three grievances were excluded from this objective. Two of the three excluded grievances had aggrieved inmates who refused to be interviewed and the third excluded grievance used conflict resolution and resolved the grievance.

Fourteen grievances were evaluated for this objective. Auditors reviewed the grievance memorandums to determine if the aggrieved inmate interviews were documented via audio or video.

Results

All 14 (100%) grievances met the criteria for this objective.

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Objective No. 2(b) – To Determine if the Inmate Grievance Against Staff Rose to the Level of an Administrative or Criminal Investigation.

Criteria

Custody Division Manual, Section 8-03/040.00, Grievances Against Staff (October 2018), states:

UNIT COMMANDER RESPONSIBILITIES

Determination of Course of Action

The concerned unit commander is responsible for evaluating each inmate grievance against staff to determine the appropriate course of action. The validity of the allegations, 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. Depending on the circumstances, the following courses of action should be considered by the unit commander:

- *Request the Internal Investigation Bureau (IAB) conduct an administrative investigation.*
- *Request the Internal Criminal Investigation Bureau (ICIB) conduct a criminal investigation if there is reason to believe a crime has been committed.*

Audit Procedures

Auditors reviewed the 17 grievances against staff to determine if the grievances rose to the level of an administrative or criminal investigation.

Results

Upon review of the grievance memorandums and/or use of force memorandums, auditors determined none of the grievances rose to the level of an administrative or criminal investigation. Therefore, they were not applicable to this sub-objective.

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Objective No. 3 - Notification to the Aggrieved Inmate

Objective No. 3(a) - To Determine if a Written Response was Provided to the Aggrieved Inmate Within the Mandated Time Frame.

Criteria

Custody Division Manual, Section 8-03/040.00, Grievances Against Staff (October 2018), states:

UNIT COMMANDER RESPONSIBILITIES

Required Notification to the Aggrieved Inmate

The aggrieved inmate shall be provided with a response within fifteen (15) days of the Department's receipt of the grievance. This response shall consist of either the result of grievance, or a notification that the Department is unable to complete the investigation within fifteen (15) days, and has therefore initiated an extension or placed the grievance in an interim status...

Procedures

Auditors reviewed the 17 grievances against staff to determine if a written response was provided to the aggrieved inmate within the mandated time frame. Auditors reviewed CARTS to determine if a written response was given to the aggrieved inmate within 15 days of the Department's receipt of the grievance.

Results

Thirteen of the 17 (76%) grievances met the criteria for this objective. Four grievances did not contain a written response to the aggrieved inmates within 15 days, and thus did not meet the criteria.

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Objective No. 3(b) - To Determine if Aggrieved Inmate was Notified of the Results of the Investigation, Within Ten (10) Calendar Days of the Unit Commander's Approval of the Disposition.

Criteria

Custody Division Manual, Section 8-03/040.00, Grievances Against Staff (October 2018), states:

UNIT COMMANDER RESPONSIBILITIES

Required Notification to the Aggrieved Inmate

In cases where the Department has provided the inmate with an Extension Notification or Interim Status Notification, the aggrieved inmate must be notified of the results of the investigation, within ten (10) calendar days of the unit commander's approval of the disposition; however, a notification of the disposition to the aggrieved inmate shall not be made regarding allegations of force or when an administrative or criminal investigation has been initiated until the entire process has been completed, including the Internal Affairs Bureau's review of administrative investigations. Once the review process has been completed for these types of investigations, the aggrieved inmate shall be notified of the results of the investigation, but not any discipline imposed, within ten (10) calendar days.

Procedures

Auditors reviewed the 17 grievances against staff to determine if the aggrieved inmate was notified of the results of the investigation within ten (10) calendar days of the unit commander's approval of the disposition. Auditors reviewed CARTS and documents provided by NCCF. All grievances were evaluated for this objective.

Results

Fourteen of the 17 (82%) grievances met the criteria for this objective. Three grievances did not meet the criteria because auditors were not able to evaluate the documentation in CARTS to verify if the aggrieved inmate was notified of the results of the investigation, within ten (10) calendar days of the unit commander's approval of the disposition.

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Objective No. 4 - Inmate Grievance Package was forwarded to the Discovery Unit

To Determine if the Completed Investigation was Forwarded to the Discovery Unit within 60 days

Criteria

Custody Division Manual, Section 8-03/040.00, Grievances Against Staff (October 2018), states:

UNIT COMMANDER RESPONSIBILITIES

With the exception of those grievances resulting in alleged force, administrative, or criminal investigations, the unit commander shall ensure the inmate grievance is completed and the original is forwarded to the Discovery Unit within sixty (60) days of receipt of the initial grievance.

Procedures

Auditors reviewed the 17 grievances against staff to determine if the completed investigations were forwarded to the Discovery Unit within 60 days of receipt of the initial investigation. Auditors reviewed the Performance Recording and Monitoring System (PRMS)⁴ to determine the date the Discovery Unit received the completed investigations.

Results

None of the 17 (0%) grievances met the criteria for this objective. All of the grievances were not forwarded to the Discovery Unit within 60 days of receipt of the initial grievance.

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⁴ The PRMS provides systematic recording of data relevant to incidents involving uses of force, shootings commendations/complaints (grievances) involving Department personnel.

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Objective No. 5 – Appeal of Grievances Against Staff

Objective No. 5(a) – To Determine if an Uninvolved Area Commander Performed the First Level Appeal and if the Aggrieved Inmate was Notified of the Disposition.

Criteria

Custody Division Manual, Section 8-04/030.10, Appeals of Grievances Against Staff, (October 2018), states:

Unless otherwise specified by this policy, all grievances against staff shall be reviewed and adjudicated by the respective unit commander. When an inmate submits an appeal regarding a grievance against a staff member, which has been adjudicated by the unit commander, the appeal shall be subject to the following levels of review:

First-Level Appeal Review

- *First-level appeals shall be reviewed by an area commander who was not involved in the review of the initial grievance. The inmate shall be advised, in writing, whether the appeal was upheld or denied, and the resulting disposition of the grievance, within fifteen (15) calendar days of the Department's receipt of the appeal.*

Procedures

Auditors evaluated CARTS for the 17 grievances against staff to determine if the inmate was advised of the results, in writing, within 15 calendar days for first level appeals.

Results

Upon review of the grievance documentation in CARTS, auditors determined none of the grievances were appealed by the aggrieved inmate. Therefore, they were not applicable to this sub-objective.

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Objective 5(b) – To Determine if the Second Level Appeal was Reviewed by the Respective Division Chief and if the Aggrieved Inmate was Notified of the Disposition.

Criteria

Custody Division Manual, Section 8-04/030.10, Appeals of Grievances Against Staff (October 2018), states:

Second-Level Appeal Review

- *If an inmate's first-level appeal is denied, or if the inmate is not satisfied with the action(s) taken to address the situation, he or she may submit another appeal. Second level appeals shall be reviewed by the respective division chief. The inmate shall be advised, in writing, whether the second appeal was upheld or denied, and the resulting disposition of the grievance, within fifteen (15) calendar days of the Department's receipt of the appeal...*

Procedures

Auditors evaluated CARTS for the 17 grievances against staff to determine if the inmate was advised of the results, in writing, within 15 calendar days for second level appeals.

Results

Upon review of the grievance documentation in CARTS auditors determined none of the grievances were appealed by the aggrieved inmates. Therefore, they were not applicable to this sub-objective

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SUMMARY OF AUDIT RESULTS

The audit yielded the following results:

Table No. 1 - Summary of Audit Results

Objective No.	AUDIT OBJECTIVES	Met the Criteria
1	Supervisor Responsibilities	
1(a)	<i>To determine if the inmate grievance against staff alleging retaliation was documented on a memorandum to the respective Division Chief.</i>	67%
1(b)	<i>To determine if the inmate grievance against staff alleging a use of force led to a use of force investigation.</i>	100%
1(c)	<i>To determine if the inmate grievance against staff was assigned to a sergeant, who was not the employee against whom the grievance was directed nor the employee's direct supervisor.</i>	65%
2	Investigation	
2(a)	<i>To determine if the aggrieved inmate interview was documented via audio or video in a private area.</i>	100%
2(b)	<i>To determine if the inmate grievance against staff rose to the level of an administrative or criminal investigation.</i>	N/A
3	Notification to the Aggrieved Inmate	
3(a)	<i>To determine if a written response was provided to the aggrieved inmate within the mandated time frame.</i>	76%
3(b)	<i>To determine if aggrieved inmate was notified of the results of the investigation, within ten calendar days of the unit commander's approval of the disposition.</i>	82%
4	Inmate Grievance Package was forwarded to the Discovery Unit	
4	<i>To Determine if the Completed Investigation was Forwarded to the Discovery Unit within 60 days.</i>	0%
5	Appeal of Grievances Against Staff	
5(a)	<i>To determine in an uninvolved Area Commander performed the first level appeal and if the aggrieved inmate was notified of the disposition.</i>	N/A
5(b)	<i>To determine if the second level appeal was reviewed by respective Division Chief and if the aggrieved inmate was notified of the disposition.</i>	N/A

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OTHER RELATED MATTERS

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

Inconsistent Exceptions to Timeliness Submission of Inmate Grievances

Auditors evaluated the inmate grievances to determine if completed investigations were forwarded to the Discovery Unit within 60 days of initial receipt as specified in the CDM, Section 8-03/040.00, Grievances Against Staff (October 2018). During the review, auditors noted eleven grievances that had an additional 15-day extension and/or a 30-day extension or were in interim status for a period of time, which were authorized by the Unit Commander.

According to the CDM, Section 8-04/040.05, Extensions (July 2016), this allows a facility/unit to extend the due date of the inmate grievance past the allotted 15 days. A supervisor of the minimum rank of sergeant may extend the grievance due date by an additional 15 days and the Unit Commander can approve any additional extensions.

The CDM, Section 8-04/010.00, Dispositions, Interim Status Responses, and Inmate Notifications (January 2018), allows grievances to be placed on an interlude when the investigation cannot be completed within fifteen (15) calendar days because the grievance resulted in the initiation of an alleged force investigation, administrative investigation, or when the grievance was referred to another unit.

Consequently, the approved extension of days or interim status, does not extend to the submission of completed investigations to Discovery Unit beyond the established 60-day timeframe inherently resulting in delays.

Conflict Resolution Technique Offered

While auditors were reviewing the grievances against staff, they observed that the "Conflict Resolution Technique Offered" section in CARTS were blank for 17 of the 18 grievances against staff. As a result of this evaluation, auditors determined the NCCF would benefit if the section was properly filled out, allowing NCCF to track and monitor the number of conflict resolution techniques being offered to the aggrieved inmate.

In addition, the CDM, Section 8-04/020.00, Conflict Resolution, (July 2016), identifies cases that would be considered appropriate for conflict resolution. The purpose of a conflict resolution meeting is to further the Department's ongoing effort to encourage respect-based interaction with inmates. When applicable, supervisors are encouraged to utilize conflict resolution in lieu of the Department conducting a personnel investigation to resolve an Inmate Grievance Against Staff. These may include situations in which there is a misunderstanding of policy or procedures, a misunderstanding of tactics or protocols, or allegations involving discourtesy by an

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employee. Auditors determined that in 10 of the 17 inmate grievances against staff, conflict resolution was a viable option. However, auditors found that conflict resolution was only utilized once. It was not documented as to why conflict resolution was not utilized for the other grievances.

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CONCLUSION

Auditors performed analyses and made assessments to identify areas in need of 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 fully adhering to policies and procedures regarding the inmate grievance process at NCCF.

RECOMMENDATIONS

When Departmental policies and procedures are not adhered to, it results in an increased risk of liability 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 briefings of the policies and procedures. The AAB considers the results of this audit to be a helpful management tool and therefore, makes the following recommendations:

1. To ensure an unbiased grievance investigation, it is recommended that NCCF rebrief staff on CDM, Section 8-03/040.00, Grievances Against Staff, regarding assigning grievances to a supervisor who is not the employee against whom the grievance is directed, nor the employee's direct supervisor. (Objective No. 1)
2. It is recommended that the Department revise CDM, Section 8-03/040.00, Grievances Against Staff, as it relates to the timely submission of forwarding the completed investigation to the Discovery Unit. (Objective No. 4 and Other Related Matters)
3. To assist with record keeping and avoid delays submitting notifications of interim status, it is recommended that the Inmate Grievance Team implement a system to notify handling investigators when deadline dates are due. (Objective No. 3)
4. To further the Department's ongoing effort to encourage respect-based interaction with inmates, it is recommended line sergeants receive documented rebriefings on CDM, Section 8-04/020.00, Conflict Resolution, regarding Inmate Grievance Against Staff policies and procedures. (Other Related Matters)

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Views of Responsible Officials

On October 26, 2021, Custody Services Division command staff submitted a formal response to the AAB concurring with the audit results. A copy of the audit report was provided to the Office of Inspector General for their review.

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This audit was submitted on this 26th day of October 2021, by the Audit and Accountability Bureau.

Original signature on file at AAB

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