



# Los Angeles County Sheriff's Department

Audit and Accountability Bureau



## BODY WORN CAMERA AUDIT

WEST HOLLYWOOD SHERIFF  
STATION

Project No. 2022-8-A



Robert G. Luna, Sheriff

August 22, 2023

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

**BODY WORN CAMERA AUDIT  
WEST HOLLYWOOD SHERIFF STATION  
Project No. 2022-8-A**

**PURPOSE**

The Audit and Accountability Bureau (AAB) conducted a Body Worn Camera Audit of West Hollywood Sheriff Station (West Hollywood Station) under the authority of the Sheriff of Los Angeles County. The audit was performed to determine whether Department personnel at West Hollywood Station were utilizing Body-Worn Camera (BWC) equipment in accordance with the Manual of Policy and Procedures (MPP) or Department process.

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

**BACKGROUND**

In August 2020, Axon Enterprise, Inc. (Axon) was selected by the Los Angeles County Sheriff's Department (LASD) as the BWC vendor and cloud-based records management system, internally referred to as Digital Evidence Management System (DEMS). LASD utilizes Axon's Evidence.com cloud-based system to store digital media generated from BWC usage.

The first BWCs were deployed on October 1, 2020, to five pre-selected patrol stations (Century Station, Industry Station, Lakewood Station, Lancaster Station, and West Hollywood Station). As of January 2023, a total of 4,991 BWCs have been deployed throughout LASD.

**West Hollywood Sheriff Station**

LASD's West Hollywood Station provides law enforcement services for the city of West Hollywood and the unincorporated Universal City Walk entertainment center. The station employs 168 sworn and professional staff. West Hollywood Station started deploying BWCs in October 2020.

**Body Worn Camera Unit**

LASD's Body Worn Camera Unit (BWCU) is responsible for the issuance of BWC equipment, and for providing training to all authorized users. As of November 30, 2022, 4,546 Department personnel have been trained in the use of a BWC and Evidence.com.

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Separately, 301 Department personnel have been trained to use Evidence.com without being issued a BWC. Personnel trained in Evidence.com without being issued a BWC are typically comprised of BWC video reviewers, managers, and auditors.

**Body Worn Camera Storage Data**

LASD personnel who conduct any enforcement or investigative contact (including calls for service or self-initiated “observation” stops and detentions) with the public is required to record the entire contact on BWC video.

Personnel who capture video on a BWC are required to enter certain metadata<sup>1</sup> for the event, using the BWC equipment and software provided by Axon. The metadata is required to be consistent with other data, documents, or information on the event, such as police reports (Incident Reports) and electronic patrol logs (Incident History report or Daily Deputy Worksheet<sup>2</sup>), which are stored on separate Department systems.

All BWC entries contain an “Audit Trail” which is an electronic tracking system that provides a record of uploads, views, downloads, transfers, and modifications to copies of the original record.

**Body Worn Camera Dashboard**

The BWCU, in partnership with Data Systems Bureau (DSB), has created a BWC dashboard which displays a station’s BWC activation compliance. The dashboard was built using Microsoft Power BI<sup>3</sup>, which analyzes data from both LASD’s Computer Aided Dispatch<sup>4</sup> (CAD) system and Evidence.com to identify calls for service or observations which necessitate the activation of a BWC. The dashboard sends out weekly compliance emails to personnel with less than 100% activation compliance.

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<sup>1</sup> Per Manual of Policy and Procedures, Section 3-06/200.03, Definitions, Metadata is the searchable data specific to the digital file, URN numbers, tag numbers, and other descriptors used to identify digital evidence, and required to be added to digital files to facilitate searching for the file.

<sup>2</sup> The Deputy Daily Worksheet is a permanent electronic detailed report of a patrol unit’s activity during a shift. The report is generated by the Computer Aided Dispatch system based on incidents assigned to or created by the deputy.

<sup>3</sup> Power BI is an interactive data visualization software product developed by Microsoft with a primary focus on business intelligence. It is part of the Microsoft Power Platform.

<sup>4</sup> The Computer Aided Dispatch system is a multi-faceted computer system used by the Department to log/document patrol-related incidents and maintains electronic records of patrol activity including “Call for Service” and deputy initiated “Observations.”

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**METHODOLOGY**

**Scope**

This audit encompassed five main objectives to determine whether Department personnel at West Hollywood Station were utilizing Body-Worn Camera (BWC) equipment in accordance with the Manual of Policy and Procedures (MPP):

- Objective No. 1 – Body Worn Camera Training Requirement
- Objective No. 2 – Body Worn Camera Activation Requirements
- Objective No. 3 – Body Worn Camera Recording Requirements
- Objective No. 4 – Body Worn Camera Data Entry Requirements
- Objective No. 5 – Body Worn Camera Oversight

**Audit Time Period**

The audit time period was the month of July 2022.

**Audit Population**

In determining the population for this audit, auditors identified a population of 7,571 BWC video recordings from Evidence.com for West Hollywood Station during the audit period and reviewed a random statistical valid sample of 95 BWC video recordings<sup>5</sup>. Of the 95 BWC video recordings, 75 showed an enforcement or investigative contact involving a member of the public and were selected as the audit population.

Some characteristics of the audit objectives require that the audit population differ due to the applicable criteria, which are described in the Procedures and Results section for each objective of this audit.

**PRIOR BODY WORN CAMERA AUDITS**

This is the first Body Worn Camera audit by the Audit and Accountability Bureau.

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<sup>5</sup> Auditors selected a statistically valid random sample using a one-tail test with a 95% confidence level and a 4% error rate.

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**SUMMARY OF RESULTS**

This audit of the use of body worn cameras at West Hollywood Station revealed that although all personnel who use BWC equipment are trained, there were significant issues with activation of the cameras when required and issues with inputting required information consistently or accurately.

Without video recordings that show the entire interaction between personnel and the public, along with proper labeling of videos, the Department cannot fully achieve greater transparency and accountability. Additionally, patrol supervisors have not been conducting sufficient self-audits of BWC videos to detect and correct issues.

**Table No. 1 - Summary of Audit Results**

<b>Objective No.</b>	<b>Audit Objectives</b>	<b>Met the Criteria</b>
<b>1</b>	<b>BODY WORN CAMERA TRAINING REQUIREMENT</b>	
1(a)	Mandated Body Worn Camera Training Compliance	<b>100%</b>
<b>2</b>	<b>BODY WORN CAMERA ACTIVATION REQUIREMENTS</b>	
2(a)	Proper Activation of Body Worn Camera	<b>63%</b>
2(b)	Documenting Reason for Failure to Activate BWC	<b>0%</b>
<b>3</b>	<b>BODY WORN CAMERA RECORDING REQUIREMENTS</b>	
3(a)	Completeness of Video Recordings	<b>83%</b>
3(b)	Documenting Reason for Incomplete Video Recordings	<b>0%</b>
<b>4</b>	<b>BODY WORN CAMERA DATA ENTRY REQUIREMENTS</b>	
4(a)	Proper Entry of Video Content Information	<b>100%</b>
4(b)	Proper Entry of Video Retention	<b>89%</b>
4(c)	Timeliness in Uploading Video Recordings	<b>96%</b>
4(d)	Documenting Reason for Viewing Other Video Recordings	<b>0%</b>
4(e)	Accidental Activation Code Entries	<b>79%</b>
4(f)	Non-Activation Code Entries	<b>83%</b>
<b>5</b>	<b>BODY WORN CAMERA OVERSIGHT</b>	
5(a)	Department BWC Activation Compliance Reports	<b>44%</b>

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**DETAILED FINDINGS**

**Objective No. 1 – Body Worn Camera Training Requirement**

Auditors determined if Department members who were assigned a BWC completed the mandated Department-approved training.

**Objective No. 1(a) - LASD Body Worn Camera Training Compliance**

Criteria

Manual of Policy and Procedures, Section 3-06/200.40, Training Required, (August 2020), states:

*Department members who are assigned a body worn camera (BWC) must complete Department-approved training in the proper use, maintenance, and policies of the devices and Digital Evidence Management System (DEMS) before deploying a BWC or utilizing DEMS.*

Procedures

Auditors evaluated the training records of the 92 deputies who deployed their BWC during the audit period to determine if the personnel completed the required BWC training prior to deployment of the BWC. Auditors verified that the required BWC training was completed by each deputy by looking up the personnel's name on the BWC training report that was generated by Training Bureau from the Learning Management System (LMS)<sup>6</sup>. For deputies whose names were not listed on the BWC training report from LMS, auditors obtained the BWC training date from the BWCU who maintains records of BWC training.

The personnel met the criteria for this objective if their name is listed on the BWC training report provided by the Training Bureau or if the training date was provided by the BWCU.

Results

All 92 (100%) personnel met the criteria for this objective.

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<sup>6</sup> The Learning Management System (LMS) is a countywide learning and training system that provides online courses to employees of the Los Angeles County.

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**Objective No. 2 – Body Worn Camera Activation Requirements**

Auditors determined if Department personnel properly activated their BWC or documented a reason for their failure to activate.

**Objective No. 2(a) – Proper Activation of Body Worn Camera**

Criteria

Manual of Policy and Procedures, Section 3-06/200.08, Body Worn Cameras – Activation, (August 2020), states:

*Department personnel shall activate their body worn camera (BWC) prior to initiating, or upon arrival at, any enforcement or investigative contact involving a member of the public, including all:*

- *Vehicle stops;*
- *Pedestrian stops (including self-initiated consensual encounters);*
- *Calls for service;*
- *Code-3 responses, including vehicle pursuits;*
- *Foot pursuits;*
- *Searches;*
- *Arrests;*
- *Uses of force, including any transportation of the subject;*
- *In-custody transports of persons who are uncooperative, belligerent, or threatening;*
- *Suspect, victim, and witness interviews (except as indicated in the Manual of Policy and Procedures section 3-06/200.18, Body Worn Camera Recording Exceptions); and/or*
- *Any encounter with a member of the public who is or becomes uncooperative, belligerent, or otherwise hostile...*

Procedures

Auditors evaluated the 75 BWC video recordings in the audit population. For each BWC video recording, auditors reviewed the content of the video to determine if the deputy activated their BWC prior to initiating, or upon arrival at, any enforcement or investigative contact involving a member of the public.

In addition, auditors reviewed the information in the associated Incident History report or Daily Deputy Worksheet to determine if the existence and the content of the video recording matches the information recorded in the associated reports.

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A BWC video recording met the criteria for this objective if it showed that Department personnel activated their BWC prior to initiating, or upon arrival at, any enforcement or investigative contact involving a member of the public.

Results

Of the 75 BWC video recordings evaluated, 47 (63%) met the criteria for this objective. Twenty-eight did not meet the criteria because the deputies were observed activating their BWC during the contact, or after they have conducted an enforcement or investigative contact with a member of the public.

In addition, three of the 75 BWC video recordings reviewed have information on the Incident History report and Deputy Daily Worksheet that do not match the existence of the video recordings. See Table No. 2.

**Table No. 2 – Existence of BWC Recordings Not Matching Reports**

BWC Video ID	Finding Description
WHD0074	There is a BWC video recording, but the incident was cleared with a clearance code 950 (No body-worn camera video required per policy).
WHD0158	There is a BWC video recording but per Unit History report, the deputy was not able to respond to the Call for Service.
WHD0164	There is a BWC video recording, but the incident did not show up in the DDWS and the deputy's unit did not show up in the Unit History report.

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**Objective No. 2(b) – Documenting Reason for Failure to Activate BWC**

Criteria

Manual of Policy and Procedures, Section 3-06/200.15, Documentation Required for Failing to Activate Body Worn Camera or Recording the Duration of the Contact, (August 2020), states:

*If a Department member is unable or fails to activate their body worn camera (BWC) prior to initiating an enforcement or investigative contact, fails to record an entire contact, or interrupts the recording for any reason, other than the exceptions listed in section 3-06/200.18, they shall document their reasons in any accompanying log entries, reports, memoranda, and metadata.*

Procedures

Auditors evaluated the 28 BWC video recordings identified in Objective No. 2(a) wherein the BWC was not properly activated, or the activation was not timely. For each BWC video recording identified, auditors determined whether a reason was documented in any accompanying log entries, reports, memoranda, and metadata.

A BWC video recording met the criteria for this objective when the reasons for failure to activate are documented in any accompanying log entries, reports, memoranda, and metadata.

Results

Of the 28 BWC video recordings evaluated, none (0%) met the criteria for this objective because the reason for failing to properly activate or timely activate their BWC, was not documented in any accompanying reports.

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**Objective No. 3 – Body Worn Camera Recording Requirements**

Auditors determined if Department personnel continuously recorded the enforcement or investigative activity or provided a reason for failure to record.

**Objective No. 3(a) – Completeness of Video Recordings**

Criteria

Manual of Policy and Procedures, Section 3-06/200.13, Recording of the Entire Contact, (August 2020), states:

*The body worn camera (BWC) shall continue recording until the enforcement or investigative contact involving a member of the public has ended. If an investigative or enforcement contact involving a member of the public resumes after the video has stopped, the Department member shall reactivate the BWC device and continue recording.*

Procedures

Auditors evaluated the 75 BWC video recordings in the audit population. For each BWC video recording, auditors reviewed the content of the video to determine if the recording continued until the enforcement or investigative contact involving a member of the public had ended.

The BWC video recording met the criteria for this objective if the recording continued until the end of the contact.

Results

Of the 75 BWC video recordings evaluated, 62 (83%) met the criteria for this objective. Thirteen did not meet the criteria for this objective because the BWC was deactivated while the law enforcement or investigative contact with a member of the public was still ongoing.

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**Objective No. 3(b) – Documenting Reason for Incomplete Video Recordings**

Criteria

Manual of Policy and Procedures, Section 3-06/200.15, Documentation Required for Failing to Activate Body Worn Camera or Recording the Duration of the Contact, (August 2020), states:

*If a Department member is unable or fails to activate their body worn camera (BWC) prior to initiating an enforcement or investigative contact, fails to record an entire contact, or interrupts the recording for any reason, other than the exceptions listed in section 3-06/200.18, they shall document their reasons in any accompanying log entries, reports, memoranda, and metadata.*

Manual of Policy and Procedures, Section 3-06/200.18, Body Worn Camera Recording Exceptions, (August 2020), states:

*Department members may stop a recording of the body worn camera (BWC) during a required activation period with a member of the public when:*

- *A witness or victim refuses to provide a recorded statement and the encounter is non-confrontational.*
- *In the Department member's judgment, a recording would interfere with their ability to conduct an investigation, or may be inappropriate, because of the victim or witness' physical condition, emotional state, age, or other sensitive circumstances (e.g., a victim of rape, incest, or other form of sexual assault);*
- *The recording would risk the safety of a confidential informant, community member informant, or undercover officer; and/or*
- *Inside patient-care areas of a hospital, rape treatment center, or other healthcare facility unless an enforcement action is taken in these areas...*

*If a recording exception is utilized by a BWC-equipped Department member, they shall:*

- *Announce the reason for stopping the video prior to turning the BWC recording off.*
- *Document the deactivation reason in the metadata file for the event in the Digital Evidence Management System (DEMS); and*
- *Document the deactivation in any associated written report.*

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Procedures

Auditors evaluated the 13 BWC video recordings identified in Objective No. 3(a) wherein the BWC was deactivated while the law enforcement or investigative contact with a member of the public was still ongoing. For each BWC video recording identified, auditors determined, while viewing the video recording, whether the reason for failing to record an entire contact, or interrupting the recording for any reason, was a listed exception in the policy. If the reason was other than the exceptions listed in the policy, auditors determined if personnel documented their reasons in accompanying log entries, reports, memoranda, and metadata.

A BWC video recording met the criteria for this objective when either of the following occurred:

- a. The reason for failing to record an entire contact, or interrupting the recording, was listed as one of the exceptions in MPP Section 3-06/200.18; or
- b. If the reason was other than the exceptions listed in the policy, the reason was documented in accompanying log entries, reports, memoranda, and metadata.

Results

Of the 13 BWC video recordings evaluated, none (0%) met the criteria for this objective because the reason for failing to record an entire contact did not fall within the exceptions listed in the policy and the reason was not documented in any accompanying reports. See Table No. 3.

**Table No. 3 – Incomplete Video Recordings**

BWC Video ID	Finding Description
WHD0149	The BWC was deactivated while the traffic stop was still ongoing, and the other deputy was still speaking with the driver. There was no other video related to the same tag number for the deputy during the same date/time. No reason for early deactivation was provided.
WHD0002	The BWC was not activated until after the deputy conducted a traffic stop and went back to his car. There was no other video related to the same tag number for the deputy during the same date/time. No reason for non-activation was provided.
922-04560-0973-255	There were two video recordings with the same video ID for the deputy during the same date/time. In the first video recording, the BWC was deactivated while the traffic stop was still ongoing. In the second video recording, the driver was still speaking when the recording stopped. In both video recordings, the reason for early deactivation was not provided. In addition, there was a 5-minute gap from the end of the first video and the start of the second video recording.

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BWC Video ID	Finding Description
922-04110-0977-384	The BWC was deactivated while the deputy was still interviewing the victim. There was no other video related to the same URN number for the deputy during the same date/time. No reason for early deactivation was provided.
WHD0074	There were three video recordings related to this video ID for the deputy during the same date/time. In the first and second video recordings, the BWC was deactivated while the deputy was still speaking to a member of the public during an investigation. In both video recordings, the reason for early deactivation was not provided. In addition, there was a 3-minute gap between the end of the first video and the start of the second video recording.
WHD0004	The BWC was deactivated while the deputy was still speaking with a member of the public during an investigation. There was no other video related to the same tag number for the deputy during the same date/time. No reason for early deactivation was provided.
922-04216-0972-144	There were three video recordings related to this video ID for the deputy during the same date/time. In the last video recording, the BWC was deactivated while the witness was still speaking during an investigation. No reason for early deactivation was provided.
WHD0027	The BWC was deactivated while the deputy was still in the middle of the traffic stop. The deputy was heading back to the vehicle that was stopped when the BWC was deactivated. There was no other video related to the same tag number for the deputy during the same date/time. No reason for early deactivation was provided.
WHD0158	The BWC was deactivated while the deputy was still speaking with a member of the public during an investigation. There was no other video related to the same tag number for the deputy during the same date/time. No reason for early deactivation was provided.
922-04727-0972-242	There were four video recordings related to this video ID for the deputy during the same date/time. In the second video recording, the BWC was deactivated while the deputy was still speaking with the suspect. No reason for early deactivation was provided.
WHD0091	The BWC was deactivated when the deputy was about to go back inside the station office after speaking with an informant/complainant. Upon viewing another deputy's video recording for the same tag number during the same date/time, it seems like the deputy went back to speaking with the informant/complainant (about 07:31) but his BWC was not activated since there was no other video related to the same tag number for the deputy during the same date/time. No reason for non-activation was provided.
922-04812-0977-071	There were two video recordings related to this video ID for the deputy during the same date/time. In the second video recording, the deputy was still speaking with the victim/complainant when the BWC was deactivated. No reason for early deactivation was provided.
922-04356-0975-153	There were eight video recordings related to this video ID for the deputy during the same date/time. In the third and sixth video recordings, the BWC was deactivated while the deputy was still speaking with the victims/witnesses. No reason for early deactivation was provided.

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**Objective No. 4 – Body Worn Camera Data Entry Requirements**

Auditors determined if Department personnel properly entered the required BWC data; uploaded BWC video recordings; and documented viewing of other BWC video recordings.

**Objective No. 4(a) – Proper Entry of Video Content Information**

Criteria

Manual of Policy and Procedures, Section 3-06/200.48, Identifying Recordings, (August 2020), states:

*For each incident recorded on a body worn camera (BWC), Department members shall enter metadata for the event type and other required information using the BWC equipment and software that best describes the content of the recording (i.e. arrest, traffic stop, report) prior to the end of their shift. BWC recordings are not a replacement for written reports or other required documentation such as a log summary in the Deputy Daily Worksheet (DDWS).*

Procedures

Auditors evaluated the 75 BWC video recordings in the audit population. For each BWC video recording, auditors compared the metadata (ID, TITLE, TAG) of the recordings in Evidence.com with the Uniform Report Number (URN) and tag numbers used on the Incident History report and Daily Deputy Worksheet, to determine if the metadata information best describes the content of the recording.

A BWC video recording met the criteria for this objective when the metadata information matches the URN and tag numbers used on the Incident History report and Daily Deputy Worksheet.

Results

All 75 (100%) BWC video recordings met the criteria for this objective because the BWC metadata contained information that best described the incident captured and was consistent with the Incident History report and Deputy Daily Worksheet.

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**Objective No. 4(b) – Proper Entry of Video Retention**

Criteria

Manual of Policy and Procedures, Section 3-06/200.73, Retention, (August 2020), states:

*All body worn camera (BWC) records will be stored by the cloud-based Digital Evidence Management System (DEMS) from the manufacturers for the term of the contract using the following criteria:*

- *All recordings shall be retained for a minimum period of three years;*
- *Recordings associated with an URN number and a statistical code which represents a 9 retention, shall be held for 9 years; and*
- *Recordings associated with an URN number and a statistical code which represents a 0 retention shall be held indefinitely...*

Procedures

Auditors evaluated the 75 BWC video recordings in the audit population. For each BWC video recording, auditors reviewed the CATEGORY of the video recordings in Evidence.com and determined if the video recording was labeled with the proper retention.

A BWC video recording met the criteria for this objective when the CATEGORY information is labeled with the proper retention.

Results

Of the 75 BWC video recordings evaluated, 67 (89%) met the criteria for this objective. Eight did not meet the criteria for this objective because the deputy either entered the incorrect retention or left the retention period blank. See Table No. 4.

**Table No. 4 – Retention Findings**

Number of BWC Video Recordings	Finding Description
6	The BWC video recording's retention should have been either "9" or "0" because the videos have an associated URN
2	The BWC video recording's retention period was added three months after the video was uploaded in Evidence.com

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**Objective No. 4(c) – Timeliness in Uploading Video Recordings**

Criteria

Manual of Policy and Procedures, Section 3-06/200.50, Storage of Recordings, (August 2020), states:

*At the end of each shift, members shall upload all body worn camera (BWC) recordings to secure storage by docking the device at the station/unit.*

Procedures

Auditors evaluated the 75 BWC video recordings in the audit population. For each BWC video recording, auditors compared the “Recorded On” time and the “Uploaded On” time in Evidence.com and determined the recordings were uploaded by the personnel at the end of their shift assignment (EM, AM or PM shift).

A BWC video recording met the criteria for this objective when the recording was uploaded by personnel at the end of their shift assignment.

Results

Of the 75 BWC video recordings evaluated, 72 (96%) met the criteria for this objective. Three did not meet the criteria for this objective because the video recordings were uploaded more than one day after the end of the deputy’s shift assignments.

For two of the three video recordings, the deputies worked overtime at Universal Studios City Walk, which is not located at West Hollywood Station, and had no access to a docking station. Per West Hollywood station, personnel reporting to their assignment at Universal Studios City Walk, commute to and from their residence before and after their shift, and the immediate docking of the BWC and uploading of video is not practical or reasonable. Therefore, West Hollywood Station believed that they were exempted from the policy. However, MPP Section 3-06/200.50 Storage of Recordings, does not provide exemptions for unique situations such as this.

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**Objective No. 4(d) – Documenting Reason for Viewing Other Video Recordings**

Criteria

Manual of Policy and Procedures, Section 3-06/200.53, Viewing of Body Worn Camera Recordings, (August 2020), states:

*All body worn camera (BWC) video will be reviewed only on a right-to-know and need-to-know basis and will only be viewed in furtherance of a criminal investigation, administrative necessity, or audit. Recordings shall not be routinely or randomly viewed solely for the purpose of searching for policy violations where no independent allegation or evidence of a policy violation exists.*

*Department members are permitted to view BWC recordings through two mediums (Department-issued smartphone device or Department computer). All Department members who view a video other than their own shall document in the audit trail their reason for viewing the video...*

Procedures

Department members are permitted to view BWC video recordings other than their own under certain circumstances, however the reason for viewing shall be documented in the audit trail per policy.

Auditors evaluated the 75 BWC video recordings in the audit population. For each video recording, auditors determined if the video recording was viewed by personnel other than the deputy who created the video. Of the 75 BWC video recordings, eight were viewed by personnel other than the owner of the video. For each video recording, auditors determined if the reason for viewing the video recording other than their own was documented in the audit trail.

A BWC video recording met the criteria for this objective when the reason for viewing another personnel's video recording was documented in the audit trail.

Results

Of the eight BWC video recordings evaluated, none (0%) documented the reason for viewing the video in the audit trail.

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Auditors did not make a determination as to whether the viewer had a “right-to-know and need-to-know” basis for viewing the video recording due to the finding that no documentations were made to articulate the reason for viewing the videos.

**Objective No. 4(e) – Accidental Activation Code Entries**

Criteria

Body Worn Camera (BWC) Unit, BWC Important Message - Proper Identification of BWC Videos for Non-Investigative/Enforcement Contacts, (August 2022), states:

*There have been instances when personnel have created body-worn camera videos for citizen contacts at the station front counter, or in the field, where there was no enforcement or investigative activity related to a call for service, observation (TAG), or crime (URN). Recently, it was discovered many of these videos were identified as Accidental Activations (e.g...CER9999, LMT9999, CAS9999) in EVIDENCE.COM as there was no associated TAG/URN. To address this issue, the BWC Unit recommends Department members ID these videos using your station mnemonic followed by four 8's (e.g...CER8888, LMT8888, CAS8888) in the “ID field” of your BWC video. This will allow personnel to properly account for these types of videos.*

Procedures

Auditors identified 43 BWC video recordings in Evidence.com with the ID of WHD9999 or WHD0999 during the audit period. For each BWC video recording, auditors reviewed the content of the video and determined if there was no enforcement or investigative activity and that the video recordings were indeed accidental or unintentional activations.

A BWC video recording met the criteria for this objective when the content of the video did not show any enforcement or investigative contact with a member of the public.

Results

Of the 43 BWC video recordings, 34 (79%) met the criteria for this objective. Nine did not meet the criteria for this objective because the deputies were seen intentionally activating their BWC to record an enforcement or investigative contact with a member of the public, however, it was logged as being an accidental activation.

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Project No. 2022-8-A**

**Objective No. 4(f) – Non-Activation Code Entries**

Criteria

Body Worn Camera (BWC) Unit, BWC Important Message (Clearance Codes), (May 2022), states:

*To report non-activations more accurately, the Department has created the below clearance codes for deputy personnel to indicate reason(s) why a body-worn camera video does not exist for the specific call for service or observation they are assigned to:*

- 950 – No body-worn camera video required per policy
- 951 – BWC-Failed to activate safety reasons
- 952 – BWC-Informant/Witness refused to be recorded
- 953 – Watch/Incident commander authorized no BWC video
- 954 – Did not respond to call for service

*It is the **ADVICE** of the BWCU that deputies begin using these clearance codes to clear calls for service and observations not requiring a body-worn camera activation per policy. Deputies can still add “NOBWC” or “NO BWC” to the MDC/CAD clearance narrative for calls for service and observations not requiring body-worn camera activation per policy. The body-worn camera compliance reports will use these clearance codes and clearance narrative phrases to determine if a call for service or observations is required for each assigned deputy.*

Procedures

Auditors identified a population of 2,897 CAD entries that were cleared using one or more “No BWC” clearance codes during the audit period and reviewed a random statistical sample of 93 CAD entries<sup>7</sup>. Auditors evaluated the 93 CAD entries that were cleared using one or more “No BWC” clearance codes to determine if the clearance codes were used appropriately.

A CAD entry met the criteria for this objective when the “No BWC” clearance codes were used appropriately.

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<sup>7</sup> Auditors selected a statistically valid random sample using a one-tail test with a 95% confidence level and a 4% error rate.

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Results

Of the 93 CAD entries evaluated, 77 (83%) met the criteria for this objective. Sixteen entries did not meet the criteria for this objective because the “No BWC” clearance codes were not used appropriately. See Table No.5.

**Table No. 5 – Misuse of No BWC Clearance Codes**

Number of BWC Video Recordings	Finding Description
8	A No BWC clearance code was used but a BWC should have been activated because contact was made with a member of the public as documented in the clearance narrative and per review of the related reports.
2	A No BWC clearance code was used but there was an associated tag number or URN. In addition, the associated tag number or URN had a BWC video that shows an enforcement or investigative contact with a member of the public.
6	A different No BWC clearance code should have been used.

In addition, of the 93 CAD entries reviewed, six were not marked as “EXEMPT” in the BWC Dashboard. These calls for service or observations were marked as requiring a BWC activation and were therefore included in determining the deputy’s activation compliance rate.

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**Objective No. 5 - Body Worn Camera Oversight**

Auditors evaluated the effectiveness of Department BWC compliance emails.

**Objective No. 5(a) – Department BWC Activation Compliance Reports**

Criteria

The BWCU sends out weekly compliance emails to personnel with less than 100% activation compliance. These compliance emails are auto generated from the BWC Dashboard which compares videos in Evidence.com with patrol log CAD entries. The email reports summarize the personnel's activation compliance for each week.

Typically, when a deputy's compliance rate is less than 100%, it is due to a call for service or self-initiated observation that is missing a video. This can occur when either the ID of the video does not match with an incident's tag number or URN, or when there were no videos uploaded for the call for service or self-initiated observation.

The compliance emails provide an opportunity for personnel to make any necessary changes or corrections in Evidence.com or their patrol log CAD entries to ensure that all calls for service or observations that required a BWC activation are associated with a BWC video.

Procedures

Auditors reviewed 16 deputies with less than 90% activation compliance rate during the sampled week of July 18 to 24, 2022. In October 2022, auditors reevaluated each deputy to determine if the BWC Dashboard, for the same period, reflected any changes and to see if activation compliance rates increased.

The deputy met the criteria for this objective when compliance emails were addressed, by making the necessary changes or corrections in Evidence.com or their patrol log CAD entries, and the activation compliance rates increased.

Results

Of the 16 deputies evaluated, seven (44%) met the criteria for this objective because there was an increase in their activation rate, five of which even achieved a 100% activation compliance rate. However, for all seven deputies, the missing videos were uploaded, or the ID of the video was changed between 2-11 days after the call for service or observation. It was further noted that for one of the seven deputies, the BWC device

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was not docked and remained turned off for 11 days and the videos in the BWC were not uploaded to Evidence.com the entire time.

Nine personnel did not meet the criteria for this objective because there was no change in the deputy's activation compliance rate. See Table No. 6.

**Table No. 6 – Activation Compliance Report Findings**

Number of Deputies	Finding Description
8	The calls for service or observations mentioned in the compliance emails had no available BWC videos. Therefore, personnel cannot address the issues in their activation compliance emails.
1	The deputy has not received BWC training as of the review date and has not been assigned a BWC but received an activation compliance email.

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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.

*Completeness of BWC Data Captured in Evidence.com*

Of the 7,571 BWC video recordings from Evidence.com during the audit period, auditors noted that 132 video recordings are missing the retention period. Inaccurate or missing video category could affect the retention of video recordings as outlined in the Department's retention requirements.

*Patrol Station Self-Auditing Process*

Auditors evaluated the current process for patrol stations to self-audit BWC videos. During the audit period, station supervisors have not been conducting inspections of body-worn camera videos to detect and correct issues.

**SUMMARY OF RECOMMENDATIONS**

When Department policies and procedures are not adhered to, it may result in an increased risk or an inability to be compliant. The AAB considers the results of this audit to be a helpful management tool and therefore, makes the following recommendations:

1. It is recommended that West Hollywood Station management develop recurring briefings of BWC policies related to the below:
  - To ensure that personnel activated/de-activated their BWC per policy, and to document the findings and corrective actions resulting from the review. (Objective No. 2)
  - To identify personnel who failed to activate their BWC or failed to record an entire contact, to determine if the reasons are within policy and are documented in their reports. (Objective No. 2 and Objective No. 3)
  - To ensure that proper category (retention) and video ID (tag or URN) are used. (Objective No. 4 and Other Related Matters)
  - To ensure that videos were uploaded at the end of the shift, as stated in the current policy. (Objective No. 4)

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- To ensure that personnel who viewed another personnel's video, documented the reason for doing so. (Objective No. 4)
2. It is recommended that West Hollywood Station management develop a process to periodically review videos with WHD9999 or WHD0999 ID to ensure that the videos are indeed accidental activations and to brief personnel in the proper use of WHD9999 ID. (Objective No. 4)
  3. It is recommended that West Hollywood Station management develop a process to review CAD entries that were cleared using one or more "No BWC" clearance codes to ensure that the clearance codes were used appropriately and a BWC was not activated. (Objective No. 4)
  4. It is recommended that West Hollywood Station management develop a process to review the weekly Activation Compliance Emails received to track personnel's adherence to the BWC activation policy. (Objective No. 5)
  5. It is recommended that the Department revise existing BWC policy to allow patrol stations to self-audit BWC video recordings. (Other Related Matters)

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**Views of Responsible Officials**

On April 6, 2023, West Hollywood Station submitted a formal response to the AAB and generally concurred with the audit results. West Hollywood Station disagreed in some of the audit results but understood that AAB conducted the audit strictly based on existing Department policy and procedures. West Hollywood station also acknowledged that the audit provided valuable information where West Hollywood Station can make improvements in the use of the BWC and adherence to Department policy.

Audit and Accountability Bureau presented the final audit report to the Division Director, Office of Constitutional Policing.

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This audit was submitted on this 22nd day of August, by the Audit and Accountability Bureau.

*Original signature on file at AAB*

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