

# LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

## AUDIT AND ACCOUNTABILITY BUREAU



## Part II of Public Complaints Audit: Initiating and Classifying of Public Complaints Antelope Valley Stations

Project No. 2024-1-A



**Los Angeles County Sheriff's Department  
Audit and Accountability Bureau**

**Part II of Public Complaints Audit:  
Initiating and Classifying of Public Complaints  
Antelope Valley Stations  
Project No. 2024-1-A**

**AUDIT REPORT**

**PURPOSE**

The Audit and Accountability Bureau (AAB) conducted the Public Complaints Audit under the authority of the Los Angeles County Sheriff's Department (LASD or the Department), pursuant to the United States Department of Justice<sup>1</sup> (DOJ) Antelope Valley (AV) Settlement Agreement (Agreement).

The Public Complaints Audit was conducted in three separate audits (Part I, II, and III) to provide timely feedback to Lancaster and Palmdale Stations (AV Stations). Each of the three audits addressed the requirements of the Agreement.

**OBJECTIVE, SCOPE, AND METHODOLOGY**

**Audit Scope and Criteria**

This audit, designated as Part II, focused on assessing the initiation and classification of public complaints by the AV Stations. Parts I and III will also assess other critical Agreement requirements.

This will be a recurring audit. The AAB will evaluate all the objectives in each recurring audit, which will be conducted as indicated in Table No. 1 below.

**Table No. 1 – Part II Projected Due Dates and Audit Time Period**

Project No.	Projected Due Date	Population Time Period
Project No. 2024 – 1 – A	March 8, 2024	October 1, 2023, to December 31, 2023
Project No. 2024 – 16 – A	May 9, 2024	October 1, 2023, to December 31, 2023
Project No. 2024 – 34 – A	July 9, 2024	January 1, 2024, to June 1, 2024

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<sup>1</sup> United States of America v. The County of Los Angeles and The Los Angeles County Sheriff's Department. Case Number CV 15-03174, April 28, 2015.

The Department's compliance was measured against the Agreement Compliance Metrics (compliance metrics) provided by the AV DOJ Compliance Unit, along with additional direction provided by the AV Monitoring Team (MT).

### **Audit Population and Sampling**

The population consisted of all Watch Commander's Service Comment Report (WCSCR) investigations for complaints received by the AV Stations from October 1, 2023, to October 31, 2023. These WCSCR investigations should have been completed from December 1, 2023, to December 31, 2023. For this audit, the WCSCR investigations were considered completed when reviewed and approved by the North Patrol Division. However, as of January 31, 2024, none of these WCSCR investigations have been completed. As a result, the AV Stations did not comply with the Agreement.

To provide an overview of how well the AV Stations managed the initiation and classification of public complaints, the AAB extended the audit period to January 1, 2023, through December 31, 2023, to identify completed WCSCR investigations.

As of January 31, 2024, three (3%) of the 105 WCSCR investigations investigated by Lancaster Station were completed, and 21 (23%) of the 90 WCSCR investigations investigated by Palmdale Station were completed for a total of 24 completed WCSCR investigations. The auditors reviewed the three completed investigations for Lancaster Station. For Palmdale Station, the auditors selected and evaluated the three most current and completed WCSCR investigations. A total of six completed WCSCR investigations were evaluated for the AV Stations.

As of March 1, 2024, the WCSCR investigations generated at the AV Stations from October 1, 2023, to December 31, 2023, have not been completed. Twenty-one WCSCRs were generated for this period for Lancaster Station and 17 were generated for Palmdale Station. Auditors will re-evaluate the same audit period of October 1, 2023, to December 31, 2023, for Project No. 2024-16-A.

During the audit period of October 2023, auditors requested a record of civil claims and lawsuits received by the AV Stations. This was to determine the presence of complaints and whether they resulted in a WCSCR. There was one civil claim and two lawsuits received by AV Stations.

### **AUDIT OBJECTIVES**

The audit consisted of one main objective with a total of eight sub-objectives. The auditors evaluated the AV Stations separately for each objective and combined the results to determine whether the Department complied with the compliance metrics.

## Summary of Preliminary Findings

The auditors noted the following preliminary findings during the audit:

### Sub-Objectives that Met the Compliance Metrics

The auditors observed the AV Stations were compliant in two [Objective 1(b), and 1(g)] of the eight sub-objectives that are applicable to the compliance metrics. The AAB would like to acknowledge the concerted efforts made by the AV Stations in implementing the practices required by the Agreement, which resulted in AV Stations compliance for these two sub-objectives. The auditors recommend the AV Stations continue to implement the required policies to institute meaningful and positive changes within the AV community. The AAB will re-evaluate these objectives in each recurring audit to determine if compliance was sustained.

In addition, the auditors observed one [objective 1(h)] of the eight sub-objectives, which resulted in “N/A”<sup>2</sup> because the corresponding criteria did not apply to the WCSCR investigations being reviewed for the audit period. The criteria for Objective 1(h) required station commanders in the AV to refer alleged incidents of misconduct to the Internal Affairs Bureau (IAB) or Internal Criminal Investigations Bureau (ICIB) for further investigation or review consistent with the Administrative Investigations Handbook. However, none of the WCSCR investigations reviewed escalated to the level of an administrative or criminal investigation.

### Sub-Objectives that Did Not Meet the Compliance Metrics

The auditors also observed the AV Stations failed to meet five [Objective 1(a), 1(c), 1(d), 1(f) and 1(e)] of the eight sub-objectives that are applicable to the compliance metrics. The AV Stations are mandated to meet or exceed those agreed upon compliance metrics.

The AAB will re-evaluate these objectives in each recurring audit to measure improvement. In addition, the recurring audits will ensure timely recommendations are provided to the AV Stations to allow for prompt implementation of corrective actions for the objectives that continue to be out of compliance.

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<sup>2</sup> N/A means Not Applicable.

Table No. 2 below indicates the audit results based on the AV Stations' compliance and the compliance metrics.

**Table No. 2 - Summary of Compliance Metrics Findings**

Objective No.	Audit Objectives	Compliance Metrics %	Lancaster %	Palmdale %	AV Total
<b>1</b>	<b>INITIATING AND CLASSIFYING OF PUBLIC COMPLAINTS</b>				
1(a)	<i>Prompt Initiation of Complaint</i>	100%	33%	66%	50%
1(b)	<i>Discouraging or Inhibiting a Complaint</i>	95%	100%	100%	100%
1(c)	<i>Watch Commander Initiate a WCSCR or Provide Justification in Watch Commander's Log</i>	100%	13%	14%	13%
1(d)	<i>Field Supervisor's Documentation of Contacts That Did Not Constitute a Complaint</i>	100%	100%	50%	63%
1(e)	<i>Identify all Significant Allegations in a Complaint</i>	95%	100%	66%	83%
1(f)	<i>Alleged Misconduct not Resulting in a WCSCR Investigation - Civil Claims and Lawsuits</i>	100%	50%	0%	33%
1(g)	<i>Service Versus Personnel Complaints</i>	95%	100%	100%	100%
1(h)	<i>WCSCR Versus Administrative Investigation</i>	95%	N/A	N/A	N/A

## DETAILED PRELIMINARY FINDINGS

This report will provide detailed information for those objectives which did not meet the compliance metrics.

### Objective No. 1 – Initiating and Classifying of Public Complaints

This objective evaluated four specified investigatory requirements for public complaint investigations, which are detailed in the compliance metrics.

#### Objective No. 1(a) – Prompt Initiation of Complaint

##### Criteria

There are no applicable compliance metrics for this sub-objective; however, in the MT 2020 Audit of Community Complaints (Sub-Objective 2.5) the MT analyzed all 52 complaints in their population to ensure AV supervisors were promptly initiating a WCSCR investigation.

The auditors evaluated the WCSCR investigations in the population, including related source documentation and audio/video files, to determine if there is any evidence that the initiation of the complaint was delayed due to Department actions.

### Preliminary Findings

The auditors evaluated the investigative packet, Body-Worn Camera (BWC) footage, and recorded telephonic conversations to determine if there was any evidence the initiation of the complaint was delayed due to Department actions.

Of the six WCSCR investigations reviewed, three (50%) investigations met the criteria for this objective. The remaining three (50%) investigations did not meet the criteria for this objective because the AV Stations did not initiate the WCSCR investigation as soon as they were made aware of the allegation.

**L-1<sup>3</sup>:** The Use of Force (UOF) incident occurred on August 22, 2022. The supervising sergeant who conducted the use of force investigation interviewed the complainant on August 22, 2022. During the interview, the complainant alleged that deputies used force, but the allegation was contrary to the force reported by the involved deputies. However, Lancaster Station delayed in initiating the WCSCR. The WCSCR form was not completed until January 30, 2023, 153 days after the allegation was made.

**L-3:** The UOF incident occurred on October 26, 2022. During the watch commander interview, which was conducted on October 26, 2022, the complainant alleged deputies used force upon their initial contact with him. However, the WCSCR form was not completed until March 27, 2023, 152 days after the allegation was made.

**P-3<sup>4</sup>:** On May 29, 2023, Palmdale Station received an email from the Assistant Field Deputy for the Los Angeles County Board of Supervisors. The email indicated a member of the Pearblossom Town Council made an allegation against a deputy from Palmdale Station. The supervisor who conducted the WCSCR investigation contacted the complainant and initiated the WCSCR investigation on June 22, 2023, 25 days after the allegation was made.

### Recommendations

It is recommended the AV Station command staff create a corrective action plan to address station personnel who frequently delay the initiation of a WCSCR investigation. These plans may include documenting these violations in a Performance Log Entry (PLE) or Administrative Investigation. Additionally, AV Station command staff should ensure all supervisors comply with the Service Comment Report (SCR) Handbook.

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<sup>3</sup> L refers to Lancaster Station. The number represents the sample being referred to of the three WCSCR investigation reviewed for Lancaster Station.

<sup>4</sup> P refers to Palmdale Station. The number represents the sample being referred to of the three WCSCR investigation reviewed for Palmdale Station.

## **Objective No. 1(b) – Discouraging or Inhibiting a Complaint**

### Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Public Complaints, Complaint Intake, Paragraphs 125 and 126 (October 2019), Section 3F state:

- F. In 95% of cases when an employee is found to have refused to accept a personnel complaint, discouraged the filing of a complaint, or provided false or misleading information about filing a complaint, appropriate corrective action is taken, to potentially include discipline up to and including termination.*

### Preliminary Findings

The auditors evaluated the investigative packet, BWC footage, and recorded telephonic conversations to determine whether there were cases in which an employee was found to have refused to accept a complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint.

All six (100%) WCSCR investigations reviewed met the criteria for this objective.

### Recommendations

Given the success rates in accepting public complaints for the AV Stations, it is crucial to reinforce positive behaviors and leverage these successes for continuous improvement. It is recommended to incorporate these results in routine briefings by recognizing and sharing the outcomes which can foster a positive culture within the Department. Sustaining ongoing monitoring practices not only prolongs the positive outcomes, but also serves as a source of insights for other patrol stations seeking to improve their practices.

## **Objective No. 1(c) – Watch Commander Initiate a WCSCR or Provide Justification in Watch Commander’s Log**

### Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Complaint Intake, Paragraphs 126 (October 2019), Section E states:

- E. A supervisor who determines a public complaint does not constitute a personnel or service complaint records the complaint and rationale for that decision either in a supervisor’s report or entry in the Watch Commander’s log.*

## Preliminary Findings

### **Watch Commander's Log – Phone Calls**

The auditors evaluated the AV Station supervisor's entries in the Watch Commander's Log in the Station/Bureau Administration Portal (SBAP) and phone calls received by the Stations' watch commanders. This review determined whether supervisors should have initiated a WCSCR or provided suitable justifications in their entries when a member of the public initiated a complaint to a supervisor, and it was concluded that no WCSCR investigation was necessary. The auditors listened to 191 calls from the watch commander lines that were recorded on NICE Inform to see if a complaint should have been initiated. 15 phone calls contained elements of a public complainant. Those 15 calls were evaluated for this objective.

Of the 15 watch commander line phone calls reviewed, two (13%) of the phone calls met the criteria for this objective. The remaining 13 (87%) phone calls did not meet the criteria for this objective because AV Station supervisors should have initiated a WCSCR form when they were made aware of the allegation but did not.

**L-1: Service Complaint** - The complainant spoke with the watch commander and alleged the deputies advised him they would contact him if they located his stolen vehicle. The complainant stated he was never contacted by the deputies when his vehicle had been located and, because he was not contacted, the complainant incurred tow fees. The complainant also alleged he was informed by the watch commander that the fees could be waived if he came down to the Station. However, he was later informed that the tow yard fees could not be waived. A WCSCR should have been initiated.

**L-2: Service Complaint** – The complainant alleged that on October 8, 2023, she called Lancaster Station three times regarding a call for service for a burglary. The complainant stated it took over three hours for deputies to respond to the location. A WCSCR should have been initiated.

**L-3: Personnel Complaint** – The complainant alleged that deputies went to his house regarding an incident involving one of his sons. The complainant stated he informed the deputies his son was in custody regarding that incident. The complainant added one of the deputies was rude and told him he was going to put a warrant out for his son. At the end of the conversation, the complainant stated he did not want to file a complaint; however, based on the severity of the allegation, the watch commander should have initiated a WCSCR to document the alleged behavior.



**L-4:** Personnel Complaint – The complainant called and asked to speak with a specific lieutenant, who was informed by the watch commander that the lieutenant was not working on this specific day. The complainant then stated he had a complaint about deputies who searched his vehicle. The complainant asked if the lieutenant could call him back regarding the complaint. A query on PRMS revealed no WCSCR was initiated under the complainant's name. The watch commander should have initiated a WCSCR.

**L-5:** Personnel Complaint – The complainant alleged deputies kicked his wife on her ankle during a detention, and the handcuffs placed on him hurt his hand. At the end of the conversation, the complainant stated that the deputies were professional; however, a WCSCR should have been initiated.

**L-6:** Service Complaint – The complainant (same complainant as L-1) called and spoke with the watch commander about his vehicle that had been towed. The complainant informed him that he spoke with a sergeant a day before, who told him that he could get his tow fees waived. The complainant again stated the deputies did not notify him that his vehicle was being towed after it was recovered. The watch commander should have initiated a WCSCR, but instead told the complainant to call back.

**L-8:** Personnel Complaint - The complainant alleged while he was in the lobby of Palmdale Station, the watch commander told him, "Leave or shut up, or I will have you arrested." The complainant called Lancaster Station and asked for the name of the watch commander at Palmdale Station. For an unknown reason, the Lancaster Station watch commander was not able to provide the complainant with the information he had asked for. However, based on the severity of the allegation, the Lancaster Station watch commander should have initiated the WCSCR and forwarded it to Palmdale Station.

**P-1:** Personnel Complaint – The complainant alleged a deputy illuminated the patrol vehicle's spotlight at his vehicle while he was driving, which almost caused the complainant to veer off the road. The complainant stated this has happened to him on two other occasions within the last two months.

**P-2:** Personnel Complaint – The complainant (same complainant as L-3) alleged that deputies went to his house regarding an incident involving one of his sons. The complainant stated he informed the deputies his son was in custody regarding that incident. The complainant added one of the deputies was rude and told him that he was going to put a warrant out for his son. A query on PRMS revealed no WCSCR initiated under the complainant's name. Furthermore, there was no Watch Commander's Log entry regarding this call justifying why no WCSCR was initiated.

**P-3:** Service Complaint – The complainant alleged she had left messages for a deputy to call her back. The complainant stated on September 19, 2023, the deputy dropped off a family at her hotel and told the manager she would bring her a voucher as payment for the family's stay. The complainant has been waiting to receive the voucher and would like to speak with the deputy. A WCSCR should have been initiated.

**P-5:** Service Complaint – The complainant stated she was not satisfied with how the deputies handled the call for service regarding individuals smoking and using drugs out in public. A WCSCR should have been initiated.

**P-6:** Service Complaint – The complainant alleged she called the Station for a call for service regarding a possible assault, and deputies did not arrive to the call. The complainant stated she called several times and deputies did not respond. A WCSCR should have been initiated.

**P-7:** Service Complaint – The complainant alleged a deputy left him on hold for over an hour. The complainant stated he was going to make a report to the Office of the Inspector General (OIG) regarding this incident. A WCSCR should have been initiated.

### Recommendations

The AAB recommends that AV command staff routinely audit the Watch Commander's Log entries and phone calls received through the watch commander line. This will ensure that AV Stations' personnel assigned to this position properly document complaints and non-complaint incidents.

Additionally, it is recommended the AV Stations ensure personnel assigned as the watch commander are informed and educated on the policies and procedures for waiving vehicle storage fees.

### **Objective No. 1(d) – Field Supervisor's Documentation of Contacts That Did Not Constitute a Complaint**

#### Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaint Intake, Paragraph 125 and 126 (October 2019), Section 3C and 3E states:

- C. Absent reasonable justification, when a civilian seeks to make a personnel complaint in person, LASD personnel make themselves available in person at the station or in the field.*
- E. A supervisor who determines a public complaint does not constitute a personnel or service complaint records the complaint and rationale for that decision either in a supervisor's report or entry in the Watch Commander's log.*

### Preliminary Findings

The auditors evaluated the AV Station supervisor's entries with clearance code 777 in the Mobile Digital Computer (MDC) log. This review determined whether supervisors should have initiated a WCSCR or provided suitable justifications in their entries when a member of the public initiated a complaint to a supervisor, and it was concluded that no WCSCR investigation was necessary. The auditors reviewed the on-scene sergeant or lieutenant's BWC footage to evaluate this criterion.

In all eight of the incidents, AV supervisors made themselves available in person at the station or in the field.

Of the eight MDC entries with a 777-clearance code reviewed, five (63%) of the entries met the criteria for this objective. The remaining three (37%) entries did not meet the criteria for this objective because AV Station supervisors made a log entry in the MDC inaccurately stating that a complaint was not required; however, after auditors reviewed BWC footage, they determined that a WCSCR investigation should have been initiated by the field sergeant when they were made aware of the allegation.

**P-1:** Two sergeants contacted the complainant in the lobby at Palmdale Station. The complainant made several allegations during their conversation. The complainant alleged the deputies refused to give him their badge numbers, and when he asked, threatened to take him to jail. The complainant further added they searched his person and vehicle without consent and threatened to physically hurt him. Towards the end of the conversation, one of the sergeants told the complainant he was going to talk to the deputies regarding their approach.

**P-2:** The field sergeant responded to a traffic stop at a gas station. The sergeant contacted the complainant who stated she asked the motor deputy if his camera (BWC) was on. At which point, she gestured with her hand that the deputy removed his camera and put it up near her face. The complainant added the deputy was aggressive and refused to give her his name and badge number when she requested it. The field sergeant told the complainant he would talk with the deputy regarding his overall behavior.

**P-3:** The field sergeant along with a female deputy responded to the complainant's home regarding a call for service. While the deputy was conducting her investigation away from the complainant, the field sergeant spoke with the complainant. The complainant alleged another female deputy (who was not present at the location) spoke with her earlier and was very aggressive over the phone. The complainant made this allegation throughout her conversation with the field sergeant. The field sergeant alluded that he was there because of the phone conversation the complainant had earlier with the other female deputy, to ensure everything went well.

## Recommendations

MDC 777 Clearance Codes – The AAB recommends the AV supervisors conduct weekly audits of field sergeants' MDC logs where the 777-clearance code was used to ensure they are properly documenting complaints and non-complaint incidents while out in the field.

### **Objective No. 1(e) – Identify all Significant Allegations in a Complaint**

#### Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Paragraphs 128, 130, 131 (partial) & 140 (partial) (October 2019), Section 3C states:

*C. For at least 95% of public complaints, each significant allegation of misconduct is identified, investigated and appropriately adjudicated, or the error is corrected during the management review.*

#### Preliminary Findings

The auditors evaluated the WCSCR investigations in the population, including related source documentation and audio/video files, whether the complainant specifically identified each allegation, was appropriately identified, investigated, and appropriately adjudicated, or the error was corrected during the management review. Any unaddressed allegations were reviewed by the auditors and summarized.

Of the six WCSCR investigations reviewed, five (83%) investigations met the criteria for this objective. The remaining one (17%) investigation did not meet the criteria for this objective because the investigation was not appropriately adjudicated.

**P-3:** The complainant alleged the resident deputy had not attended community meetings in almost two years, was not returning phone calls, and other duties were preventing his attendance at community meetings. Though the investigating lieutenant identified and investigated each significant allegation, the complaint was not appropriately adjudicated due to the lack of completeness of the investigation. Adjudication could have been either "Unable to Determine", due to supervisor not conducting additional interviews at the community meetings, or "Conflict Resolution Meeting" because the investigative narrative indicated the parties planned to meet. The lieutenant could have contacted the complainant and documented the results of the scheduled meeting to ensure that all allegations were discussed and addressed.

## Recommendations

The AAB recommends the AV Station supervisors who conduct investigations attempt to contact all potential witnesses and ensure all evidence is collected to be able to appropriately adjudicate each individual allegation.

### **Objective No. 1(f) – Alleged Misconduct not Resulting in a WCSCR Investigation**

#### Criteria

There is no applicable AV Agreement Compliance Metric for this objective, however Antelope Valley Settlement Agreement Personnel Complaints, Complaint Classification, Paragraph 130 (October 2019), 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.*

Public complaints may be discovered in different Department investigations or documentation. Those areas include UOF investigations, civil claims, and lawsuits. When the Department becomes aware of a significant allegation of misconduct by the public, a WCSCR investigation should be initiated to investigate and adjudicate the allegation. However, not all allegations of misconduct result in initiating a WCSCR investigation.

#### Preliminary Findings

The auditors identified and reviewed all AV Stations' civil claims and lawsuits filed during the audit period to determine whether allegations of misconduct were made and, if so, documented on a WCSCR form.

#### Civil Claims

During the audit period, one civil claim was filed for Lancaster Station. A WCSCR should have been initiated for the allegations in the civil claim, but Lancaster Station did not initiate a WCSCR. As a result, the criteria for this objective were not met for the single civil claim reviewed (0%).

Specifically:

**L-1:** The civil claim alleged that deputies from Lancaster Station were trespassing on the complainant's property and harassing the complainant. No WCSCR was initiated or located in PRMS.

## **Lawsuits**

During the audit period, the AV Stations each received one lawsuit in which a WCSCR should have been initiated. Palmdale Station did initiate a WCSCR. However, Lancaster Station did not. As a result, the criteria for this objective were not met for one (50%) of the two lawsuits reviewed.

Specifically:

**P-1:** The lawsuit alleges deputies from Palmdale Station used force upon a female while she was holding onto her infant child. A UOF investigation was initiated, but a WCSCR was not.

## **Recommendations**

The AAB recommends the AV Stations' Operations staff carefully review all civil claims and lawsuits, to ensure a WCSCR investigation is initiated when allegations of misconduct are made.

## **Objective No. 1(g) – Service Versus Personnel Complaints**

### **Criteria**

Antelope Valley Settlement Agreement Compliance Metrics, Paragraphs 128, 130, 131 (partial) & 140 (partial) (October 2019), Section 3B states:

*B. **At least 95%** of public complaints are classified properly as a service and/or personnel complaint at intake, resolution, and adjudication, or corrected during the management review.*

### **Preliminary Findings**

The auditors reviewed the WCSCR investigations within the population, including related source documentation and audio/video files to determine whether these investigations were correctly categorized as personnel and/or service complaints during intake, resolution, and adjudication or if any corrections were made during the management review process. The SCR Handbook classifies complaints in the following way:

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

All six (100%) WCSCR investigations reviewed met the criteria for this objective.

## Recommendations

Given the success rates in correctly categorizing public complaints for the AV Stations, it is crucial to reinforce positive behaviors and leverage these successes for continuous improvement. It is recommended to incorporate these results in routine briefings by recognizing and sharing the outcomes which can foster a positive culture within the Department. Sustaining ongoing monitoring practices not only prolongs the positive outcomes, but also serves as a source of insights for other patrol stations seeking to improve their practices.

### **Objective No. 1(h) – WCSCR Versus Administrative Investigation**

#### Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, IAB Referral, Paragraph 132 (October 2019), Section 2A 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 consistent with the Administrative Investigations Handbook...]*

*A. At least **95%** of the complaints in an audit sample are handled in accordance with this SA provision.*

#### Preliminary Findings

The Unit Commander is responsible for determining whether a public complaint should remain a WCSCR investigation, which excludes the imposition of discipline, or whether it should be investigated administratively or criminally, both of which can result in discipline.

The auditors reviewed the WCSCR investigations in the population, including related source documentation and audio/video files, to determine whether alleged incidents of misconduct were appropriately referred to the Internal Affairs Bureau (IAB) or the Internal Criminal Investigations Bureau (ICIB) for further investigation.

None of the WCSCR investigations reviewed escalated to the level of an administrative or criminal investigation.

## **Conclusion**

The AAB considers the results of this audit to be a helpful management tool for the AV Stations' personnel. The evidence collected strongly suggests room for improvement in personnel compliance with Department policies, and the stipulations set forth in the Agreement and compliance metrics. This underscores the importance of addressing and rectifying these compliance gaps to ensure a more effective and aligned operational framework within AV Stations.

## **Recommendations**

The purpose of this report is to provide a detailed summary of the recommendations aimed at improving compliance with the Agreement. When Department policies and procedures are not adhered to, it may result in an increased risk or an inability to comply. The AAB makes the following recommendations:

### **Objective No. 1 – Initiating and Classifying of Public Complaints**

- a) **Prompt Initiation of Complaint:** It is recommended the AV Station command staff create a corrective action plan to address station personnel who frequently delay the initiation of a WCSCR investigation. These plans may include documenting these violations in a PLE or Administrative Investigation. Additionally, AV Station command staff should ensure all supervisors comply with the SCR Handbook.
- b) **Discouraging or Inhibiting a Complaint:** Given the success rates in accepting public complaints for AV Stations, it is crucial to reinforce positive behaviors and leverage these successes for continuous improvement. It is recommended to incorporate these results in routine briefings by recognizing and sharing the outcomes which can foster a positive culture within the Department. Sustaining ongoing monitoring practices not only prolongs the positive outcomes, but also serves as a source of insights for other patrol stations seeking to improve their practices.
- c) **Watch Commander Initiate a WCSCR or Provide Justification in Watch Commander's Log:** The AAB recommends the AV command staff conduct routine audits of Watch Commander's Log entries and phone calls received through the watch commander line to ensure AV Station personnel, who are assigned to work in that position, are properly documenting complaints and non-complaint incidents.

Additionally, it is recommended AV Stations inform personnel assigned as the watch commander on the policy and procedures for waiving vehicle storage fees.



- d) **Field Supervisor's Documentation of Contacts That Did Not Constitute a Complaint:** The AAB recommends AV supervisors conduct weekly audits of field sergeants MDC logs where the 777-clearance code was used, to ensure they are properly documenting complaints and non-complaint incidents while out in the field.

Lancaster Station was notified of the incident in which a supervisor informed a civilian over the phone the Station would be able to waive the tow yard fees. Additionally, its recommended AV Stations inform personnel assigned as the watch commander on the procedures for waiving vehicle storage fees.

- e) **Identify all Significant Allegations in a Complaint:** The AAB recommends the AV Stations' supervisors investigating allegations attempt to contact all potential witnesses and ensure all evidence is collected to be able to appropriately adjudicate each individual allegation.
- f) **Alleged Misconduct not Resulting in a WCSCR Investigation:** The AAB recommends AV Stations' Operations staff carefully review all civil claims and lawsuits, to ensure a WCSCR investigation is initiated when allegations of misconduct are made.
- g) **Service Versus Personnel Complaints:** Given the success rates in correctly categorizing public complaints for AV Stations, it is crucial to reinforce positive behaviors and leverage these successes for continuous improvement. It is recommended to incorporate these results in routine briefings by recognizing and sharing the outcomes which can foster a positive culture within the Department. Sustaining ongoing monitoring practices not only prolongs the positive outcomes, but also serves as a source of insights for other patrol stations seeking to improve their practices.

## **DEPARTMENT APPLICATIONS**

- Performance Recording and Monitoring System (PRMS)
- Mobile Digital Computer (MDC)
- Station/Bureau Administration Portal (SBAP)

## **REFERENCES**

- Antelope Valley Monitoring Team Monitor's Second Audit of Community Complaints (December 2020)
- Antelope Valley Settlement Agreement Compliance Metrics (October 2019)
- Manual of Policy and Procedures, Sections 3-04/010.25, Personnel Complaints (October 2014)
- Service Comment Report Handbook (June 2011)
- United States Department of Justice – Los Angeles County Sheriff's Department Antelope Valley Settlement Agreement, Case Number CV 15- 03174 (April 2015)

### **Views of Responsible Officials**

On March 7, 2024, the Palmdale Station command staff submitted a formal response to the AAB in which they concurred with some of the audit results. On March 15, 2024, Lancaster Station command staff submitted a formal response to the AAB concurring with the audit findings. The AAB presented the final audit report to the Division Director, Office of Constitutional Policing.

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the left.

GEOFFREY N. CHADWICK  
Captain  
Audit and Accountability Bureau  
Los Angeles County Sheriff's Department