

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

AUDIT AND ACCOUNTABILITY BUREAU



Public Complaints Audit

Initiating and Classifying Public Complaints
Antelope Valley Stations
Project No. 2024-16-S



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

**Public Complaints Audit Part II
Initiating and Classifying Public Complaints
Antelope Valley Stations
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SUPPLEMENTAL 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 (DOJ) Antelope Valley (AV) Settlement Agreement (Agreement).

The supplemental audit was conducted to address the compliance issues identified during Project No. 2024-16-A¹, particularly regarding the lack of completed Watch Commander Service Comment Reports (WCSCRs) at Lancaster Station, which had significantly impacted the overall compliance rates. Since that time, Lancaster Station has completed the WCSCR investigations for the relevant audit time period, and the findings from both Lancaster and Palmdale Stations (AV Stations) are now incorporated into this report. As a result, this supplemental audit report supersedes the previous findings from Project No. 2024-16-A, providing updated compliance rates and audit results for both stations.

This audit is designated as Part II of the Public Complaints audits. The primary audit objectives were to assess whether all complaints were accepted and a Watch Commander's Service Comment Report (WCSCR) was initiated by the AV Station supervisors. In addition, auditors evaluated the Watch Commander's responsibilities when addressing and investigating public complaints, significant allegations, and accurately completing related documentation. Table No. 1 is a summary of the supplemental audits, corresponding audits and time periods.

¹ Project 2024-16-A was published on June 27, 2024

Table No. 1 – Supplemental Audits and Audit Time Periods

Supplemental Project No.	Previous Audit	Population Time Period
Not Applicable ²	2024-1-A	October 1, 2023, to December 31, 2023
Project No. 2024-16-S	2024-16-A	October 1, 2023, to December 31, 2023
Project No. 2024-24-S	2024-24-A	January 1, 2024, to March 31, 2024

OBJECTIVE, SCOPE, AND METHODOLOGY

Audit Scope and Criteria

This supplemental audit evaluated the aspects of accepting and classifying complaints initiated by the public at Lancaster Station. The Department's compliance was measured against the AV Agreement Compliance Metrics (compliance metrics) along with additional clarification provided by the AV Monitoring Team (MT).

Audit Population and Sampling

To maintain consistency with the audit procedures and the number of investigations reviewed in 2024-16-A, the five completed WCSCR investigations which were submitted to the Discovery Unit by Lancaster Station were evaluated for this supplemental audit for the audit period of October 1, 2023, to December 31, 2023. In this supplemental audit, WCSCR investigations were deemed complete once reviewed and approved by the North Patrol Division (Division). This supplemental audit will also include the findings results of five WCSCR investigations reviewed for Palmdale Station in the prior audit (2024-16-A). The auditors reviewed a total of ten WCSCR investigations.

AUDIT OBJECTIVES

This supplemental audit consisted of one main objective with eight sub-objectives and the AV Stations were evaluated separately. However, for this audit (2024-16-S) auditors evaluated Lancaster Station for five of the applicable sub-objectives [(1(a), 1(b), 1(e), 1(g) and 1(h)]. The remaining three sub-objectives [1(c), 1(d) and 1(f)] were evaluated during the previous audit (2024-16-A).

² There is no supplemental audit for Project 2024-1-A, because Palmdale and Lancaster Stations had completed WCSCR investigations for auditors to evaluate during audit time period.

Summary of Findings

Table No. 2 below, indicates the AV Stations' compliance percentage to the Antelope Valley Settlement Agreement compliance metrics. The combined AV Total indicates the AV Stations met the compliance metrics for three of the applicable sub-objectives (1d, 1g and 1h).

Table No. 2 – Objectives and Corresponding Compliance Metrics

Objective No.	Audit Objectives	Lancaster %	Palmdale %	AV Total	Compliance Metrics %
1	INITIATING AND CLASSIFYING PUBLIC COMPLAINTS				
1(a)	<i>Prompt Initiation of Complaint</i>	40%	80%	60%	100%
1(b)	<i>Discouraging or Inhibiting a Complaint</i>	80%	100%	90%	95%
1(c)	<i>Watch Commander Initiate a WCSCR or Provide Justification in Watch Commander's Log</i>	66%	0%	33%	100%
1(d)	<i>Field Supervisor's Documentation of Contacts That Did Not Constitute a Complaint</i>	N/A ³	100%	100%	100%
1(e)	<i>Identify all Significant Allegations in a Complaint</i>	80%	60%	70%	95%
1(f)	<i>Misconduct Alleged in Civil Claims and Lawsuits</i>	0%	100%	25%	100%
1(g)	<i>Service Versus Personnel Complaints</i>	100%	100%	100%	95%
1(h)	<i>WCSCR Versus Administrative Investigation</i>	100%	100%	100%	95%

³ The criteria for this sub-objective were not applicable to Lancaster Station because Lancaster Station did not have any MDC entries with a 777-clearance code for auditors to review.

Detailed Findings

This report will provide detailed information on the findings for each objective.

Objective No. 1 – Initiating and Classifying Public Complaints

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

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

Criteria

There is no specific compliance metric for this sub-objective; however, in the MT 2020 Audit of Community Complaints (Sub-Objective 2.5) the MT analyzed all 52 complaints in the audit population to determine if AV supervisors were initiating a WCSCR investigation promptly.

Procedures

Auditors reviewed the intake interviews (audio and/or video), email complaint forms, and body-worn camera (BWC) recordings, as well as recorded telephonic conversations obtained from LASD.Evidence.com. Auditors compared the information, specifically the date and time the complainant made the allegation, with the date and time the complaint was initiated as documented on the WCSCR form.

Findings

For the combined AV Stations, six of the ten WCSCR investigations (60%) met the criteria for this objective because a WCSCR investigation was initiated without delay.

For Lancaster Station, two of the five WCSCR investigations (40%) met the criteria for this objective because a WCSCR was initiated in without delay. The following investigations did not meet the criteria:

L-1⁴: The complainant filed a complaint via the Departments webpage on September 16, 2023, alleging the 911 operator (deputy) hung up the phone, while he was reporting a possible crime which occurred on September 8, 2023. The email indicates the complaint was forward to Lancaster Station Operations on September 16, 2023, at 1:27 AM. However, Lancaster Station did not initiate a WCSCR investigation until October 19, 2023, and the complainant was not interviewed by Lancaster Station personnel until April 11, 2024.

⁴ L refers to Lancaster Station. The number represents the sample being referred to of those reviewed by Lancaster Station.

L-2: Lancaster Station received a letter from the complainant dated September 18, 2023. In the letter the complainant alleged the deputy discriminated against her because he maliciously failed to contact her before he spoke with her daughter (victim) regarding the attempted theft that occurred on September 14, 2023. Lancaster Station did not generate a WCSCR investigation until October 20, 2023. Per the SCR investigation, it is unknown when or how Lancaster Station received that letter. Due to the date on the letter and the date the WCSCR investigation was initiated, coupled with Lancaster Station unable to determine when they received the letter, auditors determined the initiation of the WCSCR investigation was delayed.

L-3: On October 9, 2023, the complainant, came into the Lancaster Station lobby and filled out a complaint form. She also spoke with the on duty Watch Commander. She alleged the deputy ignored her and did not take her statement regarding the incident that occurred at the dog park. The Watch Commander offered to take the complaint, however, also stated she could wait 10 to 12 days until the criminal report was completed to file the complaint. The complainant took her written complaint form and left the station. On October 20, 2023, the complainant returned to Lancaster Station and spoke with the on duty Watch Commander, who was different than the one she spoke with on her previous visit. She made the same allegations that she reported 11 days earlier. The Watch Commander initiated the WCSCR investigation without hesitation.

In the prior audit report (2024-16-A), for Palmdale Station four of the five WCSCR investigations (80%) reviewed met the criteria for this objective because a WCSCR was initiated in a without delay. The following investigation did not meet the criteria:

P-2⁵: On October 8, 2023, Palmdale Station responded to a call for service in which the complainant was arrested for a misdemeanor. The complainant was transported to the hospital to be medically cleared for booking. While at the hospital a field sergeant responded and spoke with the complainant. At approximately 11:10 am, the complainant informed the field sergeant the arresting deputy had violated her rights. The field sergeant explained to the complainant that being handcuffed did not violate her rights. The field sergeant did not ask any follow-up questions and should have inquired further about the allegation and initiated a WCSCR investigation. The field sergeant did not document the appropriate rationale in the MDC narrative whether it was determined a WCSCR was not required. On October 8, 2023, at approximately 8pm, the complainant filed the WCSCR with the on-duty Watch Commander at the Palmdale Station lobby.

⁵ P refers to Palmdale Station. The number represents the sample being referred to of the three WCSCR investigation reviewed for Palmdale Station.

Recommendations

It is recommended the AV Stations' 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 or an Administrative Investigation. Additionally, the AV Stations' command staff should ensure all supervisors comply with the Service Comment Report (SCR) Handbook.

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.*

Procedures

Auditors reviewed the intake interviews (audio and or video) for all of the WCSCR investigations and email complaint forms for any evidence in which a Department member refused to accept a complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint.

Findings

For the combined AV Stations, nine of the ten WCSCR investigations (90%) met the criteria for this objective because AV Station personnel did not refuse or discourage the complainant from filing a complaint. ^(OBJ)

For Lancaster Station, four of the five WCSCR investigations (80%) met the criteria for this objective because Lancaster Station personnel did not refuse or discourage the complainant from filing a complaint. The following investigation did not meet the criteria:

L-3: On October 9, 2023, the complainant, came into the Lancaster Station lobby and filled out a complaint form. She also spoke with the on-duty Watch Commander. She alleged that the deputy ignored her and did not take her statement regarding the incident that occurred at the dog park. The Watch Commander offered to take the complaint, however, also stated that she could wait 10 to 12 days until the criminal report was completed to file the complaint. The complainant took her written complaint form and left the station. On October 20, 2023, the complainant came back to Lancaster Station and spoke with the on-duty Watch Commander, who was different than the one she spoke with on her previous visit. She made the same allegations that she reported 11 days earlier. The Watch Commander initiated the WCSCR investigation without hesitation.

In the prior audit report (2024-16-A), for Palmdale Station all five of the WCSCR investigations (100%) reviewed met the criteria for this objective because Palmdale Station personnel did not refuse or discourage the complainant from filing a complaint.

Recommendations

It is recommended the AV Stations' command staff conduct briefings along with documented training to ensure their personnel are aware of the provisions in the Agreement, Department policy and WCSCR Handbook as it relates to the intake of public complaints. Furthermore, a corrective action plan must be created to address station personnel who have discouraged members of the public from filing a complaint

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

Criteria

There is no specific AV Compliance Metric percentage for this objective. However, the Antelope Valley Settlement Agreement, Compliance Metrics, Personnel Complaints, Complaint Intake, Paragraph 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.

Procedures

The auditors evaluated the AV Stations' supervisor's entries in the Watch Commander's Log in the Station/Bureau Administration Portal (SBAP) ⁶and 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 a total of 156 calls from the watch commander lines that were recorded on NICE Inform⁷ to see if a complaint should have been initiated. Six phone calls contained elements of a public complaint. Those six calls were evaluated for this objective.

Auditors reviewed entries made in the Watch Commander Log labeled as a Non-Compliant Incident (NCI) and attempted to verify the documented entry information with its corresponding phone call/BWC video.

Findings

This objective was not contingent upon Lancaster completing the complaint investigations, so it was fully evaluated in the original audit report (2024-16-A). The following findings from that report are provided here for completeness.

In the prior audit report (2024-16-A), for the combined AV Stations, two of the six incidents (33%) met the criteria for this objective because AV Station supervisors initiated a WCSCR investigation when they were made aware of each allegation.

⁶ The SBAP is a data entry system designed to collect and track data related to risk management incidents, which are primarily used at a station level. The system includes data on Use of Force, Traffic Collisions, Public Comments, Pursuits, Administrative Investigations, Shots Fired, Employee Injuries, and Lawsuits & Civil Claims.

⁷ The NICE Inform is an online audio storage system used to archive incoming and outgoing calls (with additional capabilities).

For Lancaster Station, two of the three incidents (67%) reviewed met the criteria for this objective because a supervisor either initiated a WCSCR investigation or documented in the Watch Commander's Log the rationale as to why a WCSCR was not necessary. The following investigation did not meet the criteria:

L-2: Personnel Complaint - The complainant alleged the deputy did not handle the call correctly and that the deputy was discourteous. She stated, "He was out here yelling and talking crap to me". A query on the Performance Recording and Monitoring System (PRMS) revealed a WCSCR was not initiated under the complainant's name. Furthermore, there was no Watch Commander's Log entry regarding this call justifying why a WCSCR was not initiated. The watch commander should have initiated a WCSCR.

For Palmdale Station, all three incidents (0%) reviewed did not meet the criteria for this objective because a supervisor did not initiate a WCSCR investigation or document in the Watch Commander's Log the rationale as to why a WCSCR was not necessary. The following investigation did not meet the criteria:

P-1: Service Complaint – The complainant made an allegation regarding how the deputy was operating the patrol vehicle. She stated the deputy made a right turn from the opposite side of the road, right in front of her vehicle. The watch commander informed the complainant he was going to try and identify who was driving the patrol vehicle and call her back. Auditors were unable to determine if the watch commander called back the complainant, since there was no Watch Commander's Log entry regarding this call justifying why a WCSCR was not initiated. The watch commander should have initiated a WCSCR.

P-2: Personnel Complaint – The complainant alleged, after she was arrested, deputies threw away a container which contained her Social Security card along with a gold bracelet that had a charm. The lieutenant informed the complainant she could come to the station to fill out a claim form for reimbursement. A query on PRMS revealed a WCSCR was not initiated under the complainant's name. Furthermore, there was no Watch Commander's Log entry regarding this call justifying why a WCSCR was not initiated. Based on the allegation, the watch commander should have initiated a WCSCR.

P-3: Personnel Complaint – The complainant alleged the handling deputy was unprofessional. The complainant stated, "He treated me bad, he yelled at me". The complainant further added she was told by the deputy that she would not be able to speak with the watch commander. A query on PRMS revealed a WCSCR was not initiated under the complainant's name. Furthermore, there was no Watch Commander's Log entry regarding this call justifying why a WCSCR was not initiated. Based on the allegation, the watch commander should have initiated a WCSCR.

Recommendations

The AAB recommends the AV Stations' command staff conduct routine audits of watch commander log entries and phone calls received through the watch commander line to ensure the AV Stations' personnel who are assigned to work in that position are properly documenting complaints and non-complaint incidents. It is further recommended that the AV Stations' command staff recontact the complainants to accurately document and investigate the allegations.

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

Criteria

There is no specific AV Compliance Metric percentage for this objective. However, the Antelope Valley Settlement Agreement, Compliance Metrics, Personnel Complaint Intake, Paragraphs 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.*

Procedures

Auditors evaluated AV Stations’ supervisors’ entries in the Mobile Digital Computer (MDC)⁸ with clearance code 777 (assist citizen) which may be used to document a contact with a member of the public regarding any allegation that was determined not to be a complaint. The entries were evaluated to determine whether supervisors provided suitable justifications in their entries when a member of the public initiated a complaint, and it was concluded that no WCSCR investigation was necessary. The auditors also reviewed the on-scene sergeant or lieutenant’s BWC recordings for all incidents associated with complaints reviewed in Objectives 1(a) and 1(e) to determine if the complaint was either initiated promptly and appropriately or the justification for not initiating a WCSCR investigation was properly documented in the MDC log.

Auditors reviewed the MDC entry along with its corresponding BWC video to verify the information documented in the MDC entry accurately describes what is depicted in the BWC video.

Findings

This objective was not contingent upon Lancaster completing the complaint investigations; therefore, it was fully evaluated in the original audit report (2024-16-A). The following findings from that report are provided here for completeness

⁸ The MDC is a mobile laptop computer equipped in each patrol vehicle to provide a complete Computer-Aided Dispatch (CAD) package in a mobile environment. The CAD system is a multi-faceted computer system the Department uses to log or document patrol-related incidents. It maintains electronic records of patrol activities, which include Dispatch-generated 911 and general "Calls for Services" and patrol deputy-initiated "Observation" stop records in the field.

In the prior audit report (2024-16-A), for the combined AV Stations, the one MDC entry (100%) from Palmdale Station with a 777-clearance code reviewed, met the criteria for this objective because the supervisor provided suitable justification in his MDC entry when a member of the public initiated a complaint, and it was concluded that no WCSCR investigation was necessary.

Recommendations

There are no recommendations because AV Stations met the compliance requirements for this objective.

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.

Procedures

Auditors reviewed the intake interviews (audio and or video) for all of the WCSCR investigations and email complaint forms to identify the allegations made by the complainant. Auditors additionally reviewed BWC video that depicted the interaction between the deputies and complainant to confirm there were no additional allegations of misconduct that should have been identified. Auditors compared the video/audio evidence to the WCSCR investigation to ensure every allegation of misconduct was identified, investigated, and appropriately adjudicated.

Findings

For the AV Stations combined, seven of the ten WCSCR investigations (70%) reviewed met the criteria for this objective because all significant allegations were identified and adjudicated.

For Lancaster Station, four of the five WCSCR investigations (80%) reviewed met the criteria for this objective because all significant allegations were identified and adjudicated. The following investigation did not meet the criteria:

L-4: On December 3, 2023, the complainant alleged, the sergeant on scene was disrespectful, and discriminated against her because of her race. She further added that her son, was pushed by the sergeant during the detention. This WCSCR was classified as a Personnel Complaint – Discourtesy and Discrimination, it should have also been classified as a Personnel Complaint - Force due to the allegation sergeant pushed the complainant's son. Even though the investigating supervisor addressed all three allegations in the narrative portion of the SCR investigation, the fact the force allegation was not appropriately documented affects the accuracy of the documentation in PRMS.

In the prior audit report (2024-16-A), for Palmdale Station, three of the five investigations (60%) reviewed met the criteria for this objective, because all significant allegations were identified and adjudicated. The following investigation did not meet the criteria:

P-1: The complainant made several allegations. The investigation covered only two of them: the first, the male deputy was unprofessional and the second the female deputy attempted to assault or fight the complainant. These allegations were investigated and adjudicated appropriately based on the BWC recordings and surveillance video. The investigation does not include the allegation of the female deputy being unprofessional. In a third email sent by the complainant on October 3, 2023, the complainant stated, "I spoke with a watch commander, he was not really concerned about the issue, my life was in danger". There is no mention of this allegation in the WCSCR investigation, and it should have been addressed.

P-2: When the investigating supervisor spoke with the complainant, he stated the deputies pushed him and used profanity towards him. Neither allegation was addressed in the WCSCR investigation. This WCSCR was classified as a Personnel Complaint – Discourtesy. However, since the complainant alleged, he was pushed by the deputies during the detention, this WCSCR it should have also been classified as a Personnel Complaint - Force due to the allegation deputies pushed the complainant.

Recommendations

The AAB recommends the AV Stations command staff review all pertinent evidence regarding the intake of the complaint to ensure the investigating supervisors accurately documented and investigated each significant allegation made by the complainant in the WCSCR investigation. This will ensure each allegation is appropriately identified, adjudicated, and documented.

Objective No. 1(f) –Misconduct Alleged in Civil Claims and Lawsuits

Criteria

There is no specific 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.

Procedures

The auditors identified and reviewed all of the 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. The auditors reviewed a total of nine civil claims and two lawsuits. Two of the civil claims, along with both lawsuits, contained elements of a public complaint and were evaluated for this objective.

Nine civil claims were filed during the audit period. Four for Lancaster Station and five for Palmdale Station. None of the five civil claims for Palmdale Station contained an allegation of misconduct and, therefore, were excluded for this objective. Two of the four civil claims for Lancaster Station were excluded from this objective, one because it did not contain an allegation of misconduct and the second because it was potentially related to an active criminal investigation.

There were two lawsuits filed during the audit period. One from Palmdale Station and one from Lancaster Station. Both lawsuits contained allegations of misconduct.

Findings

This objective was not contingent upon Lancaster completing the complaint investigations, so it was fully evaluated in the original audit report (2024-16-A). The following findings from that report are provided here for completeness.

For the AV Stations combined, one of the civil claims/lawsuits (25%) reviewed met the criteria for this objective because a WCSCR investigation was initiated for allegations made in a civil claim/lawsuit.

For Lancaster Station all three of the civil claims/lawsuits (0%) reviewed did not meet the criteria for this objective because Lancaster Station did not initiate a WCSCR investigation. The following investigations did not meet the criteria:

L-1: The complainant alleged LASD personnel trespassed onto his property, harassed him, and falsely detained him in a patrol vehicle with the heater on. Per PRMS a WCSCR was not initiated.

L-2: The complainant alleged LASD personnel damaged his property (Microsoft XBOX) during a search of a vehicle in which he was a passenger. Per PRMS a WCSCR was not initiated.

L-3: The complainant alleged LASD personnel wrongfully accused him of having participated in a robbery and assaulted him by throwing him onto the ground. Per PRMS a WCSCR was not initiated.

For Palmdale Station the one lawsuit (100%) reviewed met the criteria for this objective because a WCSCR investigation was initiated for allegations made in the lawsuit.

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.*

Procedures

The auditors reviewed all of the WCSCR investigative packets obtained from the AV Stations, as well as related audio/video files obtained from LASD.Evidence.com 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.

Findings

For the combined AV Stations, all ten of the WCSCR investigations (100%) met the criteria for this objective because Station supervisors correctly categorized the WCSCR investigations as personnel and/or service complaints.

For Lancaster Station, all five of the WCSCR investigations (1000%) met the criteria for this objective because Lancaster Station supervisors correctly categorized the WCSCR investigations as personnel and/or service complaints.

In the prior audit report (2024-16-A), for Palmdale Station, all five (100%) of the WCSCR investigations reviewed met the criteria for this objective because Palmdale Station supervisors correctly categorized the WCSCR investigations as personnel and/or service complaints.

Recommendations

There are no recommendations because AV Stations met the compliance requirements for this objective.

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.*

Procedures

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

Auditors reviewed all of the WCSCR investigative packets obtained from the AV Stations, including related source documentation and audio/video files, to determine whether the alleged incidents of misconduct were appropriately referred to the Internal Affairs Bureau (IAB) or the Internal Criminal Investigations Bureau (ICIB) for further investigation.

The auditors will use the factors outlined in the Administrative Investigations Handbook (October 2005), which states:

Administrative Investigations

While most investigations will be conducted at the unit level, there may be situations that require assignment to the Internal Affairs Bureau.

Criminal Investigations

If the allegations involved are criminal in nature, the unit commander shall notify the division chief, who may request a criminal investigation. If the incident will be investigated criminally, there should be no discussion regarding the incident with the subject.

In addition, the auditors will use the factors outlined in the MPP, Section 3-04/010.25, Personnel Complaints (October 2014), which states:

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

Finally, the auditors will use the factors outlined in the SCR Handbook, which states:

If the unit commander determines that the complaint should be addressed through formal discipline, then the unit commander may initiate an administrative investigation.

In accordance with the Administrative Investigations Handbook, SCR Handbook, and MPP policy, the auditors will determine whether alleged incidents of misconduct associated with public complaints were appropriately directed to the IAB or ICIB for further investigation.

The AV Stations met the criteria for this objective if auditors concur with the AV Station unit commanders that the allegations remained a WCSCR investigations, and they were properly adjudicated.

Findings

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

For the combined AV Stations, all ten of the WCSCR investigations (100%) were not referred to IAB or ICIB and were determined by the Unit Commander to remain classified as WCSCR investigations. Based on the totality of evidence available and reviewed by the auditors, the AAB concurs with the AV Station Unit Commander's assessment that the allegations remained a WCSCR investigations and were properly adjudicated. Therefore, AV Stations met the criteria for this objective.

For Lancaster Station, all five of the WCSCR investigations (100%) met the criteria for this objective. The AAB concurs with the Lancaster Station Unit Commander's assessment that the allegations remained a WCSCR investigations and were properly adjudicated.

In the prior audit report (2024-16-A), for Palmdale Station, all five (100%) of the WCSCR investigations reviewed met the criteria for this objective. The AAB concurs with the Palmdale Station Unit Commander's assessment that the allegations remained a WCSCR investigations and were properly adjudicated.

Recommendations

There are no recommendations because AV Stations met the compliance requirements for this objective.

CONCLUSION

The AV Stations did not meet the compliance metrics for five of the eight applicable sub-objectives, mainly because AV Stations supervisors did not take complaints when they were initially made aware of allegations of misconduct. As a result, the initiation of complaints were delayed due to Department members' actions.

Based on the ten completed WCSCR investigations, Palmdale Station was compliant in five of the eight applicable sub-objectives for the compliance metrics, and Lancaster Station was compliant in two of the eight sub-objectives for the compliance metrics. The AAB acknowledges Palmdale Station's collaborative efforts in applying the practices required by the Agreement, which resulted in Palmdale Station being compliant with these sub-objectives. The results of this audit indicated areas for improvement for the AV Stations as it pertains to supervisors adhering to and implementing the provisions in the Agreement during their WCSCR investigations.

Consideration was given to concerns that Lancaster Station had prior knowledge of the supplemental audit, possibly affecting the audit results. Specifically, the complexity of the WCSCR investigations may have contributed to the timely completion of the WCSCR investigations. Additionally, the nature of these investigations may have influenced management to circumvent procedural requirements. However, the auditor's review of Lancaster Station's audit results did not demonstrate significant improvements in overall compliance at the AV Stations. Rather, the primary factors contributing to the delays appear to be the high volume of WCSCR investigations and staff shortages.

SUMMARY OF RECOMMENDATIONS

The purpose of this section is to provide a concise reference for all recommendations aimed at improving compliance with the AV Agreement and Department policies and procedures. The recommendations listed below are the same as those detailed in the above report.

Objective No. 1 – Initiating and Classifying Public Complaints

- A. **Prompt Initiation of Complaint:** It is recommended the AV Stations' 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, the AV Stations' command staff should ensure all supervisors comply with the Service Comment Report (SCR) Handbook.
- B. **Discouraging or Inhibiting a Complaint:** It is recommended the AV Stations' command staff conduct briefings along with documented training to ensure their personnel are aware of the provisions in the Agreement, Department policy and WCSCR Handbook as it relates to the intake of public complaints. Furthermore, a corrective action plan must be created to address station personnel who have discouraged members of the public from filing a complaint. These plans may include documenting these violations in a Performance Log Entry (PLE) or Administrative Investigation, if deemed appropriate.
- C. **Watch Commander Initiate a WCSCR or Provide Justification in Watch Commander Log:** The AAB recommends the AV Stations' command staff conduct routine audits of watch commander log entries and phone calls received through the watch commander line to ensure the AV Stations' personnel who are assigned to work in that position are properly documenting complaints and non-complaint incidents. It is further recommended that the AV Stations' command staff recontact the complainants to accurately document and investigate the allegations.
- E. **Identify all Significant Allegations in a Complaint:** The AAB recommends the AV Stations command staff review all pertinent evidence regarding the intake of the complaint to ensure the investigating supervisors accurately documented and investigated each significant allegation made by the complainant in the WCSCR investigation. This will ensure each allegation is appropriately identified, adjudicated, and documented.
- F. **Alleged Misconduct not Resulting in a WCSCR Investigation:** 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.

COMPREHENSIVE REVIEW

The AAB will conduct a comprehensive review of the findings noted during the three individual audits (Project No. 2024-1-A, 2024-16-S, and 2024-24-S) conducted for the Public Complaints Audit Part II. The comprehensive review will provide an analysis of the AV Stations performance for each sub-objective over the course of the three audits. The review will demonstrate the areas where the AV Stations met the compliance metrics and displayed continuous progression, as well as the areas requiring further enhancement. Data patterns, trends, and observations will also be identified.

This review will assist the AV Stations in optimizing Operations, mitigating risks, and progress toward fulfilling the requirements of the Agreement. The comprehensive review will be issued immediately following this Public Complaints Supplemental Audit (Project No. 2024-24-S).

FOLLOW-UP PROCEDURES

Within 60 days of distributing the comprehensive review to the Division and AV Stations, the AAB will conduct a follow-up of the recommendations and verify if the auditee has made necessary improvements. Verification of corrective action will be assessed by examining new directives, amended unit orders, and/or relevant documentation. The AAB will work with the auditee in understanding the implementation of audit recommendations, as it may be a lengthy process and require a collaborative effort with other Department resources.

DEPARTMENT APPLICATIONS

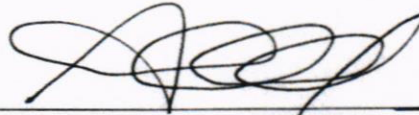
- Performance Recording and Monitoring System (PRMS)
- Mobile Digital Computer (MDC)
- Station/Bureau Administration Portal (SBAP)
- NICE Inform
- LASD.Evidence.com

REFERENCES

- Antelope Valley Monitoring Team Monitor's Second Audit of Community Complaints (December 2020)
- Antelope Valley 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 October 18, 2024, the Lancaster Station command staff submitted a response to the AAB concurring with the audit findings. The AAB presented the final audit report to the Division Director, Office of Constitutional Policing.



11/24/24

GEOFFREY N. CHADWICK

DATE

Captain

Audit and Accountability Bureau

Los Angeles County Sheriff's Department