

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

AUDIT AND ACCOUNTABILITY BUREAU



Public Complaints Audit

Investigation and Management Review and Oversight of Public Complaints
Antelope Valley Stations
Project No. 2024-17-S



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

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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. 2024-17-A, 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. 2024-17-A, providing updated compliance rates and audit results for both stations.

This audit is designated as Part III of the Public Complaints audits. The primary audit objectives were to assess whether Department supervisors conducted thorough investigations which lead to reliable and well-supported conclusions; and to review the role of management in overseeing the investigative process in addition to classifying and adjudicating complaints. Table No. 1 is a summary of the supplemental audits, corresponding audits, and time periods.

Table No. 1 – Supplemental Audits and Audit Time Periods

Supplemental Audit Project No.	Previous Audit Project No.	Audit Time Period
Not Applicable ¹	Project No. 2024-6-A	October 1, 2023, to December 31, 2023
Project No. 2024-17-S	Project No. 2024-17-A	October 1, 2023, to December 31, 2023
Project No. 2024-25-S	Project No. 2024-25-A	January 1, 2024, to March 31, 2024

¹ A supplemental audit was not necessary to be conducted for Project 2024-6-A because the AV Stations had completed WCSCR investigations for auditors to evaluate for the audit time period.

OBJECTIVE, SCOPE, AND METHODOLOGY

Audit Scope and Criteria

This supplemental audit evaluated the aspects of the investigation, management review, and oversight of public complaints 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 2024-17-A, all five completed WCSCR investigations that 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). The auditors reviewed a total of ten WCSCR investigations.

AUDIT OBJECTIVES

This supplemental audit consisted of two main objectives with 19 sub-objectives. The AV Stations were evaluated separately, and a combined AV total was calculated. The auditors noted there is no specific compliance metrics for sub-objective 2(d), "Timeliness of Adjudication". As a result, 18 of the 19 sub-objectives were measured against the compliance metrics.

Summary of Findings

Table No. 2 on the following page indicates the AV Stations' compliance to the compliance metrics. The combined AV Total indicates the AV Stations met the compliance metrics for 11 of the 18 applicable sub-objectives [1(b), 1(d), 1(e), 1(f), 1(g), 1(h), 1(i), 2(a), 2(b), 2(g), and 2(h)].

Table No. 2 – Summary of Compliance Metrics

Objective No.	Audit Objectives	Lancaster %	Palmdale %	AV Total	Compliance Metrics %
1	INVESTIGATION OF COMPLAINTS				
1(a)	<i>Identify Everyone at the Scene</i>	80%	80%	80%	85%
1(b)	<i>Interviews Conducted Separately</i>	100%	100%	100%	85%
1(c)	<i>Interview Complainant In-Person</i>	25%	40%	33%	85%
1(d)	<i>Witness Interview Requirements</i>	100%	80%	90%	85%
1(e)	<i>Additional Interviews Conducted as Needed</i>	100%	80%	90%	85%
1(f)	<i>Limited English Proficiency (LEP)</i>	N/A	100%	100%	85%
1(g)	<i>Material² Inconsistency Identified and Explained When Possible</i>	100%	100%	100%	85%
1(h)	<i>Record Entire Interviews</i>	100%	100%	100%	92%
1(i)	<i>Uninvolved Investigator</i>	100%	100%	100%	90%
1(j)	<i>Collect All Evidence</i>	100%	60%	80%	95%
1(k)	<i>Thoroughness of Investigation</i>	100%	60%	80%	92%
2	MANAGEMENT REVIEW AND OVERSIGHT				
2(a)	<i>Statement Discarded Due to Criminal History</i>	N/A	100%	100%	85%
2(b)	<i>Deputy Statement Given Preference</i>	100%	100%	100%	85%
2(c)	<i>Preponderance of Evidence</i>	80%	60%	70%	95%
2(d)	<i>Timeliness of Adjudication</i>	0% ³ 0% ⁴	40% ³ 0% ⁴	20% ³ 0% ⁴	N/A
2(e)	<i>Recordation of Critical Information on the Results of Service Comment Review Form</i>	80%	60%	70%	95%
2(f)	<i>Recordation of Non-Critical Information on the Results of Service Comment Review Form</i>	20%	80%	50%	80%
2(g)	<i>Recordation of Critical Information in the Performance Recording and Monitoring System (PRMS)⁵</i>	100%	100%	100%	95%
2(h)	<i>Recordation of Non-Critical Information in PRMS</i>	100%	100%	100%	80%

² Per the MT, “Material” refers to relevant and important information that is generally significant enough to determine or affect the outcome of an issue.

³ These percentages represent the compliance rate in which the WCSCR investigations were submitted to the Division within the required timeframe.

⁴ These percentages represent the compliance rate in which the WCSCR investigations were submitted to the Discovery Unit within the required timeframe.

⁵ The PRMS is a web-based application that systematically records data relevant to incidents involving Uses of Force, Shootings, and Commendations/Complaints regarding Sheriff’s Department personnel. In addition, PRMS tracks the progress of Administrative Investigations, Civil Claims & Lawsuits, Discovery Motions, Employee Commendations, Preventable Traffic Collisions, Custody Complaints, and Special Conditions that the Department handles.

Detailed Findings

This report will provide detailed information on the findings noted during the audit for all sub-objectives.

Objective No. 1 – Investigation of Complaints

This objective evaluated the investigation of public complaints.

Objective No. 1(a) – Identify Everyone at the Scene

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (partial), 133, 134, 135, 136 & 137 (October 2019), Section 3B (5) states:

3. *LASD will be deemed in substantial **outcomes compliance** when: ...*

*B. **At least 85%** of AV's public personnel complaint investigations meet the investigative requirements identified in the SA. This will involve a qualitative and quantitative evaluation of the following SA requirements: ...*

5. *Personnel complaint investigators:*

- a. Seek to identify all persons, including deputies, who were at the scene that gave rise to a misconduct allegation;*
- b. Note in the investigative report the identities of all deputies and witnesses who were at the scene but assert they did not witness and were not involved in the incident; and,*
- c. Conduct further investigation of any such assertions that appear unsupported by the evidence.*

Procedures

The auditors reviewed the Reporting Party, Involved Employee, and Civilian and Employee Witness information sections of the WCSCR and the Service Comment Review for each of the investigations and compared them to the corresponding Body-Worn Camera (BWC)⁶ recordings, audio recordings, and images, as well as the narrative portion of the Service Comment Review to ensure all persons at the scene of the incident were identified. If a person at the scene was not identified, the auditors determined if a detailed justification was documented in the Service Comment Review as to why the person was not identified.

⁶ The BWC is a device worn by a Department member. The device captures/records video and audio of Department member's contact with the public and allows an event to be saved as a digital file.

The auditors also verified investigators identified all deputies and witnesses who were at the scene but asserted they did not witness and were not involved in the incident. If such assertions appeared unsupported by the evidence, the auditors evaluated if the investigator conducted further investigation.

Findings

For the combined AV Stations, eight of the ten WCSCR investigations (80%) met the criteria for this objective because everyone at the scene was identified.

For Lancaster Station, four of the five WCSCR investigations (80%) met the criteria for this objective because all individuals at the scene were identified. The following investigation did not meet the criteria:

L-4⁷: Per BWC recordings, the complainant's two sons in their mid-teens to early twenties were present during the scene of the incident. They witnessed the interaction between the complainant and the involved deputy that resulted in the complaint against the deputy. Per the SCR, the investigator left messages via the complainant's cellphone and e-mailed the complainant requesting information on her two sons, but the complainant did not respond. However, they were not identified as witnesses in the civilian witness section of the WCSCR or the Service Comment Review.

In the prior audit (2024-17-A), for Palmdale Station, four of the five WCSCR investigations (80%) met the criteria for this objective because all individuals at the scene were identified. The following investigation did not meet the criteria:

P-1⁸: A potential civilian witness at the scene was not identified in the WCSCR or Service Comment Review. During the complaint intake interview with the watch commander, the complainant mentions the witness approached her and asked her if she was okay after the incident with two deputies. Surveillance footage was obtained from the witness' employer, and the witness can be seen approaching the complainant in her vehicle while the two deputies were leaving the scene. The witness' contact information could have also been obtained from the employer but the investigator did not obtain this information. In addition, per BWC recordings, the witness directs one of the deputies to the complainant upon arriving at the scene. The witness could have provided information that may have affected the result of the investigation.

⁷ L refers to Lancaster Station. The number represents the sample being referred to of the five WCSCR investigations reviewed for Lancaster Station.

⁸ P refers to Palmdale Station. The number represents the sample being referred to of the five WCSCR investigations reviewed for Palmdale Station.

Recommendations

It is recommended the proper identification of all individuals at the incident scene be documented on the WCSCR, Service Comment Review, and on a complaint investigation checklist. This checklist should be created by the Compliance Unit and utilized during the WCSCR investigation. It should detail the requirements of the Agreement and the compliance metrics. Additionally, Department policy requirements should be added as necessary. This checklist should be available to both AV Stations and required for each WCSCR investigation. It should remain attached to the investigation package and be evaluated during the management review and oversight process.

Objective No. 1(b) – Interviews Conducted Separately

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (partial), 133, 134, 135, 136 & 137 (October 2019), Section 3B (1) states:

3. *LASD will be deemed in substantial **outcomes compliance** when: ...*

*B. **At least 85%** of AV's public personnel complaint investigations meet the investigative requirements identified in the SA. This will involve a qualitative and quantitative evaluation of the following SA requirements:*

1. All interviews are conducted separately.

Procedures

The auditors reviewed the complainant and civilian interview recordings for each of the investigations and determined if any other involved individuals, including deputy witnesses, were present during the interview. The auditors reviewed the involved deputy and deputy witness statements from the corresponding Service Comment Review for each investigation and verified the investigator documented whether the interviews were conducted separately. For any instances when an interview was not conducted separately, the auditors determined if a detailed justification was documented in the Service Comment Review. The justification had to include who the individual was and why their presence during the interview was justified.

Findings

For the combined AV Stations, all ten WCSCR investigations (100%) met the criteria for this objective because all interviews were conducted separately.

For Lancaster Station, all five WCSCR investigations (100%) met the criteria for this objective because all interviews were conducted separately.

In the prior audit (2024-17-A), for Palmdale Station, all five WCSCR investigations (100%) met the criteria for this objective because all interviews were conducted separately.

Recommendations

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

Objective No. 1(c) – Interview Complainant In-Person

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (partial), 133, 134, 135, 136 & 137 (October 2019), Section 3B (2) states:

3. *LASD will be deemed in substantial **outcomes compliance** when: ...*

*B. **At least 85%** of AV's public personnel complaint investigations meet the investigative requirements identified in the SA. This will involve a qualitative and quantitative evaluation of the following SA requirements: ...*

2. Each complainant is interviewed in-person, when practical, and the investigation identifies the reason when it is not.

The MT and DOJ have agreed the investigator may rely on the complainant's recorded intake interview provided it was thorough and addressed all the issues.

Per the MT, the investigator must specifically document the reason why it was not practical to conduct an in-person interview in the Service Comment Review. If the complainant declines the in-person interview, the investigator can document this as justification for not conducting an in-person interview.

Procedures

The auditors reviewed all the complainant interview recordings and determined if each interview was conducted in-person. The auditors also reviewed the corresponding Service Comment Review to determine if the investigator documented if the complainant was interviewed in-person when practical, or why it was not practical to interview the complainant in-person.

Findings

For the combined AV Stations, three of the nine WCSCR investigations (33%) met the criteria for this objective because the complainants were interviewed in-person. For Lancaster Station, one of the five WCSCR investigations was excluded because the complainant was not interviewed. Per the SCR, several attempts were made by the investigator to contact the complainant via the complainant's cellphone. The complainant's cellphone number was the only contact information provided by the complainant via the mail-in complaint. However, the complainant never responded to any of the calls. As a result, four of the five WCSCR investigations were reviewed for this objective. One of the four WCSCR investigations (25%) met the criteria for this objective because the complainant was interviewed in-person.

The following investigations did not meet the criteria:

L-1 and L-4: The investigator interviewed the complainant, via the complainant's cellphone, and documented in the Service Comment Review it was impractical to interview the complainant in-person. However, the reason why it was impractical, was not documented.

L-5: The investigator interviewed the complainant, via the complainant's telephone, but did not document in the Service Comment Review the reason as to why the complainant interview was not conducted in-person.

In the prior audit (2024-17-A), for Palmdale Station, two of the five WCSCR investigations (40%) met the criteria for this objective because the complainants were interviewed in-person. The following investigations did not meet the criteria:

P-1: The watch commander interviewed the complainant, via the complainant's telephone, but the investigator did not document in the Service Comment Review the reason as to why the complainant interview was not conducted in-person.

P-4: The investigator interviewed the complainant, via the complainant's cellphone, and documented in the Service Comment Review it was impractical to interview the complainant in-person. However, the reason why it was impractical, was not documented.

P-5: The investigator interviewed the complainant, via the complainant's telephone, and documented in the Service Comment Review it was impractical to interview the complainant in-person. However, the reason why it was impractical, was not documented.

Recommendations

It is recommended the justification as to why it was not practical to conduct an interview in-person be documented on the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a).

Objective No. 1(d) – Witness Interview Requirements

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (partial), 133, 134, 135, 136 & 137 (October 2019), Section 3B (4) states:

3. *LASD will be deemed in substantial **outcomes compliance** when: ...*

*B. **At least 85%** of AV's public personnel complaint investigations meet the investigative requirements identified in the SA. This will involve a qualitative and quantitative evaluation of the following SA requirements: ...*

4. All witnesses, including deputies who were involved in or witnessed the incident, provide a written statement or are interviewed in person. Non-Department witnesses may be interviewed by phone, if practical.

Per the MT, if a witness' role in the complaint was not materially impactful and the BWC recording is available, there is considerable latitude given to determine the necessity of this witness interview.

Procedures

The auditors reviewed all documentation in the completed packets, including incident reports, supplemental reports, and booking packets. Additionally, the auditors reviewed all available BWC recordings and complainant/civilian witness interviews. Furthermore, the auditors reviewed the involved deputy and deputy witness statements. The auditors verified if written statements or interview recordings were available for all Department and non-Department witnesses that played an impactful role in the complaint. For all witnesses that played a minor role in the complaint, the auditors determined if a written statement, interview recording, or a detailed justification explaining why a statement or interview was not required was documented in the Service Comment.

Findings

For the combined AV Stations, nine of the ten WCSCR investigations (90%) met the criteria for this objective because all Department and non-department witnesses who played an impactful role in the complaint were interviewed. For non-department witnesses that played a minor role in the complaint, BWC recording was available and supported what occurred at the incident.

For Lancaster Station, all five WCSCR investigations (100%) met the criteria for this objective because all Department witnesses were interviewed. For non-department witnesses that played a minor role in the complaint, BWC recording was available and supported what occurred at the incident.

In the prior audit (2024-17-A), for Palmdale Station, four of the five WCSCR investigations (80%) met the criteria for this objective because all Department and non-department witnesses were interviewed. The following investigation did not meet the criteria:

P-1: A potential civilian witness at the scene was not identified in the WCSCR or Service Comment Review and was not interviewed. The watch commander was made aware of the potential civilian witness during the complaint intake interview with the complainant. The witness was also captured on BWC recordings and surveillance footage. The witness could have provided information which could have affected the results of the investigation.

Recommendations

It is recommended investigators obtain written statements or conduct interviews of all the Department and non-department witnesses. It is also recommended the justification as to why a written statement was not obtained from a Department or non-department witness or why an interview was not conducted be documented on the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a).

Objective No. 1(e) – Additional Interviews Conducted as Needed

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (partial), 133, 134, 135, 136 & 137 (October 2019), Section 3B (3) states:

3. *LASD will be deemed in substantial **outcomes compliance** when: ...*

*B. **At least 85%** of AV's public personnel complaint investigations meet the investigative requirements identified in the SA. This will involve a qualitative and quantitative evaluation of the following SA requirements: ...*

3. Investigators conduct additional interviews as necessary to reach reliable and complete findings.

In the prior audit (2024-17-A), the AV Stations complied with the Agreement if additional interviews were necessary and were conducted by the investigator. However, per the MT, the criteria is also met if no additional interviews were required as it demonstrates a thorough investigation was completed. In addition, the criteria is met if a person, except for the complainant, is not interviewed but the investigation was sufficient to reach reliable and complete findings. As a result, Palmdale Station's compliance rate for this objective for the prior audit (2024-17-A) was recalculated to address the change in the methodology used and is reflected in Palmdale Station's compliance rate in the Findings section below.

Procedures

The auditors reviewed all documentation in the completed packets, including incident reports, supplemental reports, and booking packets to determine if it was documented that additional interviews were required and conducted. Additionally, the auditors reviewed all available BWC recordings and complainant/civilian witness interviews. Furthermore, the auditors reviewed the involved deputy and deputy witness statements to assess if further interviews were performed to gather necessary information for reliable and comprehensive findings.

Findings

For the combined AV Stations, nine of the ten WCSCR investigations (90%) met the criteria for this objective because no additional interviews were needed to reach reliable and complete findings for each of the investigations reviewed.

For Lancaster Station, all five WCSCR investigations (100%) met the criteria for this objective because no additional interviews were needed to reach reliable and complete findings for each of the investigations reviewed.

For Palmdale Station, four of the five investigations (80%) met the criteria for this objective because no additional interviews were needed to reach reliable and complete findings for each of the investigations reviewed. The following investigation did not meet the criteria:

P-1: The complainant alleged one of the deputies was rude and attempted to fight her. The investigator concluded the deputy's conduct appeared reasonable. However, there was no evidence to support or refute the allegation of rudeness. There was no BWC recording of the deputy's interaction with the complainant and the surveillance footage obtained had no sound. As a result, it was not possible to determine if the deputy was rude to the complainant. However, a potential civilian witness seen on surveillance footage obtained from the witness' employer was not identified in the WCSCR or Service Comment Review and was not interviewed. This witness could have provided information that may have affected the outcome of the investigation.

Recommendations

It is recommended investigators always conduct and document the additional interviews needed to ensure that all the necessary information is collected and supported by sufficient and reliable sources in the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a).

Objective No. 1(f) – Limited English Proficiency

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (partial), 133, 134, 135, 136 & 137 (October 2019), Section 3B (6) states:

3. *LASD will be deemed in substantial **outcomes compliance** when: ...*

*B. **At least 85%** of AV's public personnel complaint investigations meet the investigative requirements identified in the SA. This will involve a qualitative and quantitative evaluation of the following SA requirements: ...*

6. When a personnel complaint investigation requires an interpreter, an interpreter not involved in the underlying complaint is used to take statements or conduct interviews of any Limited English Proficiency complainant or witness.

Per the MT, if a person's role in the complaint was not materially impactful, there is latitude regarding the interpreter who is used. However, an interpreter not involved in the underlying complaint has to be used when interviewing an LEP complainant and all LEP material witnesses.

Procedures

The auditors reviewed the complainant and the civilian witness interview recordings and determined if any of the complainants or witnesses needed an interpreter. If so, the auditors determined if an interpreter not involved in the underlying complaint was utilized to obtain a statement or interview all LEP complainants and material witnesses. For LEP witnesses that played a minor role in the complaint, the auditors determined if a supervisor involved with the complaint was used and if a detailed justification was documented in the Service Comment Review as to why a supervisor involved with the complaint was utilized.

Findings

For the combined AV Stations, the one applicable WCSCR investigations (100%) met the criteria for this objective because the interpreter was not involved in the underlying complaint.

For Lancaster Station, an interpreter was not required by any of the complainants or witnesses for any of the five WCSCR investigations reviewed. As a result, the compliance rate Lancaster Station is "N/A", as the criteria did not apply to this objective.

In the prior audit (2024-17-A), for Palmdale Station, an interpreter was required for one of the five WCSCR investigations. The one WCSCR investigation (100%) met the criteria for the objective because the interpreter was not involved in the underlying complaint.

Recommendations

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

Objective No. 1(g) – Material Inconsistency Identified and Explained When Possible

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (partial), 133, 134, 135, 136 & 137 (October 2019), Section 3B (9) states:

3. LASD will be deemed in substantial outcomes compliance when: ...

B. At least 85% of AV's public personnel complaint investigations meet the investigative requirements identified in the SA. This will involve a qualitative and quantitative evaluation of the following SA requirements: ...

9. When a personnel complaint investigation contains material inconsistencies between witness statements, efforts to resolve those inconsistencies are documented.

Per the MT, material inconsistencies are not limited to just conflicting witness statements. Material inconsistencies may include conflicting statements between the complainant, involved deputies, and/or witnesses, as well as conflicting information noted between other evidence including BWC recordings and investigative documentation.

In the prior audit (2024-17-A), the AV Stations complied with the Agreement if the investigator identified and attempted to resolve material inconsistencies that may affect the outcome of the investigation. However, per the MT, the criteria is also met if no material inconsistencies are identified as it demonstrates a thorough investigation was completed. As a result, Palmdale Station's compliance rate for this objective for the prior audit (2024-17-A) was recalculated to address the change in the methodology used and are reflected in Palmdale Station's compliance rate in the Findings section below.

Procedures

The auditors reviewed all documentation in the completed packets, including incident reports, supplemental reports, and booking packets. Additionally, the auditors reviewed all available BWC recordings and complainant/civilian witness interviews. Furthermore, the auditors reviewed the involved deputy and deputy witness statements. The auditors verified when an investigation contained material inconsistencies between the complainant, involved deputies, and/or witness statements, as well as between the BWC recordings and investigative documentation, efforts to resolve those inconsistencies were documented in the Service Comment Review.

Findings

For the AV Stations combined, all ten WCSCR investigations (100%) met the criteria for this objective because no material inconsistencies were identified.

For Lancaster Station, all five WCSCR investigations (100%) met the criteria for the objective because no material inconsistencies were identified.

For Palmdale Station, all five WCSCR investigations (100%) met the criteria for the objective because no material inconsistencies were identified.

Recommendations

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

Objective No. 1(h) – Record Entire Interviews

Criteria

Antelope Valley Monitoring Team Monitor's Second Audit of Community Complaints (December 2020), Recommendation No. 8 states:

The Parties should adopt a compliance standard that at least 92% of complainant interviews must be recorded in their entirety, or the reason for not doing so must be documented in the investigation.

Subsequent to the completion of the MTs Second Audit of Community Complaints, the Department agreed to adopt the compliance metric of 92%.

Procedures

The auditors reviewed the complainant interview recordings and determined if each interview was recorded in its entirety. For any interviews that were not recorded in their entirety, the auditors would review the Service Comment Review to determine if the investigator documented why the complainant's interview was not recorded in its entirety.

Findings

For the AV Stations combined, all nine WCSCR investigations (100%) met the criteria for this objective because all complainant interviews were recorded in their entirety or a justification as to why the interview was not recorded was provided.

For Lancaster Station, one of the five WCSCR investigations was excluded because the complainant was not interviewed. Per the SCR, several attempts were made by the investigator to contact the complainant via the complainant's cellphone. The complainant's cellphone number was the only contact information provided by the complainant via the email-in complaint. However, the complainant never responded to the calls. All four WCSCR investigations (100%) met the criteria for this objective. The interviews were recorded in their entirety for three of the investigations. Sufficient justification as to why the interview for the remaining investigation was not recorded was documented in the corresponding Service Comment Review.

In the prior audit (2024-17-A), for Palmdale Station, all five WCSCR investigations (100%) met the criteria for this objective because all complainant interviews were recorded in their entirety.

Recommendations

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

Objective No. 1(i) – Uninvolved Investigator

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (partial), 133, 134, 135, 136 & 137 (October 2019), Section 3C states:

3. *LASD will be deemed in substantial **outcomes compliance** when: ...*

*C. **At least 90%** of AV's public personnel complaint investigations are conducted by a supervisor who was not involved in the incident and who did not authorize the conduct that led to the complaint unless sufficient justification is documented in the investigation.*

Per the MT, a minimally involved supervisor may conduct an investigation for a minor allegation when no uninvolved supervisor is available. When that occurs, the rationale must be documented in the investigation. When the complaint involves an allegation of serious misconduct, an uninvolved supervisor shall conduct the investigation.

Procedures

The auditors reviewed all documentation in the completed packets, including incident reports, supplemental reports, and booking packets. Additionally, the auditors reviewed all available BWC recordings and complainant/civilian witness interviews. Furthermore, the auditors reviewed the involved deputy and deputy witness statements. The auditors verified if the supervisor that completed the investigation was not involved in the incident in any way. If the supervisor was involved in the incident, the auditors verified if a documented reason was provided in the Service Comment Review and if it was sufficient to justify the supervisor completing the investigation.

Findings

For the AV Stations combined, all ten WCSCR investigations (100%) met the criteria for this objective because the investigating supervisor was not involved in the incident.

For Lancaster Station, all five WCSCR investigations (100%) met the criteria for the objective because the investigating supervisor was not involved in the incident.

In the prior audit (2024-17-A), for Palmdale Station, all five WCSCR investigations (100%) met the criteria for the objective because the investigating supervisor was not involved in the incident.

Recommendations

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

Objective No. 1(j) – Collect All Evidence

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Management Oversight and Adjudication, Paragraphs 128, 130, 131 (partial) & 140 (partial), (October 2019), Section 3D states:

3. *LASD will be deemed in substantial **outcomes compliance** when: ...*

*D. **For at least 95%** of AV's public personnel complaints, it is apparent that all relevant evidence was considered, and credibility determinations made based upon that evidence.*

Procedures

The auditors reviewed all documentation in the completed packets, including incident reports, supplemental reports, and booking packets. Additionally, the auditors reviewed all available BWC recordings and complainant/civilian witness interviews. Furthermore, the auditors reviewed the involved deputy and deputy witness statements. The auditors verified there was evidence to support each determination made.

Findings

For the AV Stations combined, eight of the ten WCSCR investigations (80%) met the criteria for this objective because all relevant evidence was considered, and credibility determinations were made based upon that evidence.

For Lancaster Station, all five WCSCR investigations (100%) met the criteria for this objective because all relevant evidence was considered, and credibility determinations were made based upon that evidence.

In the prior audit (2024-17-A), for Palmdale Station, three of the five WCSCR investigations (60%) met the criteria for this objective because all relevant evidence was considered, and credibility determinations were made based upon that evidence. The following investigations did not meet the criteria:

P-1: The investigator did not obtain a statement from the potential civilian witness. Obtaining a statement from this individual could have assisted in collecting the necessary evidence needed to make an accurate determination regarding the allegation that one of the deputies was rude to the complainant.

P-5: The involved party alleged the deputy pushed him and used profanity. The investigator did not address the allegations in the WCSCR or Service Comment Review and did not investigate them.

Recommendations

It is recommended the collection, organization, and review of all evidence be documented on the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a). The evidence collected must be sufficient and relevant to formulate and support logical conclusions for each allegation.

Objective No. 1(k) – Thoroughness of Investigation

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (partial), 133, 134, 135, 136 & 137 (October 2019), Section 3A states:

3. *LASD will be deemed in substantial **outcomes compliance** when:*

A. ***At least 92%** of AV's public personnel complaint investigations, when viewed as a whole, are as thorough as necessary to reach reliable and complete findings.*

Procedures

The auditors reviewed all documentation in the completed packets for each of the investigations, including incident reports, supplemental reports, and booking packets. Additionally, the auditors reviewed all available BWC recordings and complainant/civilian witness interviews. Furthermore, the auditors reviewed the involved deputy and deputy witness statements. The auditors determined if the WCSCR investigations were thoroughly reviewed resulting in each allegation being addressed and appropriately adjudicated.

The auditors also assessed the appropriateness of the disposition of the WCSCR investigation on the Result of Service Comment Review when classified as "Employee Conduct Should Have Been Different" as well as the appropriateness of any corrective action⁹ taken. Based on the dispositions on the Result of Service Comment Reviews of the ten WCSCR investigations reviewed for AV Stations, the auditors concluded two of the investigations were and should have been classified as such. The auditors also determined the corrective action taken for the two WCSCR investigations was appropriate.

Findings

For the AV Stations combined, eight of the ten WCSCR investigations (80%) met the criteria for this objective because the complaint investigations were as thorough as necessary to reach reliable and complete findings.

For Lancaster Station, all five WCSCR investigations (100%) met the criteria for this objective because the complaint investigations were as thorough as necessary to reach reliable and complete findings.

⁹ Corrective action identifies the root cause in an incident, or a series of incidents, and describes what actions the Department has taken, or will take to mitigate the risk of a similar future incident.

In the prior audit (2024-17-A), for Palmdale Station, three of the five WCSCR investigations (60%) investigations met the criteria for this objective because the complaint investigations were as thorough as necessary to reach reliable and complete findings. The following investigations did not meet the criteria:

P-1: The investigator did not conduct all the necessary interviews to collect the evidence needed to conduct a thorough investigation and reach a reliable conclusion for the investigation. Allegations were made by the complainant that one of the deputies was rude and attempted to fight her. The investigator concluded the deputy's conduct appeared reasonable. However, there did not appear to be evidence supporting or negating the allegation that one of the deputies was rude. The investigator's determination for this allegation was not based upon available evidence. Identifying and interviewing the potential civilian witness could have assisted in collecting the evidence needed to determine if the allegation of the deputy being rude was accurate. This could have influenced the results of the Service Comment Review.

P-5: The allegations that the deputy pushed the involved party and used profanity were not addressed in the Service Comment Review or investigated. The necessary evidence should have been collected to address the allegations, conduct a thorough investigation, and reach a reliable conclusion for the investigation.

Recommendations

It is recommended investigators consider all related evidence, including but not limited to complainant and witness interviews, booking paperwork, crime and supplemental reports, and BWC recordings when conducting an investigation.

Objective No. 2 – Management Review and Oversight

This objective evaluated the management review and oversight of WCSCR investigations.

Objective No. 2(a) – Statement Discarded Due to Criminal History

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (partial), 133, 134, 135, 136 & 137 (October 2019), Section 3B (8) states:

3. *LASD will be deemed in substantial **outcomes compliance** when: ...*

*B. **At least 85%** of AV's public personnel complaint investigations meet the investigative requirements identified in the SA. This will involve a qualitative and quantitative evaluation of the following SA requirements: ...*

8. Personnel complaint investigations do not disregard a witness' statement merely because the witness has some connection to the complainant or because of any criminal history.

For the three audits conducted (2024-6-A, 2024-17-S, and 2024-25-S), the auditors focused on if the witness statements were disregarded due to a connection with the complainant and/or because of any criminal history. However, per the MT, it should not be limited to just witness statements. As a result, for all future audits, the auditors will determine if any statements, including complainant statements, were disregarded.

Procedures

The auditors reviewed the complainant and civilian witness interviews. In addition, auditors reviewed the involved deputy and deputy witness statements, as well as all available corresponding documentation and BWC recordings. The auditors verified the supervising investigators did not disregard a witness statement because the witness had a connection to the complainant or due to any criminal history.

Findings

For the AV Stations combined, the one WCSCR investigation (100%) met the criteria for this objective because the witness statement was not disregarded merely because the witness had a connection to the complainant.

For Lancaster Station, there were no civilian witnesses for three of the five investigations. For the remaining two investigations, witness statements could not be obtained from the three civilian witnesses noted. However, sufficient justification was documented as to why the statements were not obtained in the Service Comment Review for each investigation.

As a result, the compliance rate Lancaster Station is “N/A”, as the criteria did not apply to this objective.

In the prior audit (2024-17-A), for Palmdale Station, a witness was identified in one of the five WCSCR investigations. The investigation (100%) met the criteria for this objective because the witness statement was not disregarded because the witness had a connection to the complainant. The witness was the complainant’s spouse.

Recommendations

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

Objective No. 2(b) – Deputy Statement Given Preference

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (partial), 133, 134, 135, 136 & 137 (October 2019), Section 3B (7) states:

3. *LASD will be deemed in substantial **outcomes compliance** when: ...*

*B. **At least 85%** of AV's public personnel complaint investigations meet the investigative requirements identified in the SA. This will involve a qualitative and quantitative evaluation of the following SA requirements: ...*

7. Personnel complaint investigations do not give automatic preference for a deputy's statement over a non-deputy's statement.

Procedures

The auditors reviewed the complainant and civilian witness interview recordings. In addition, the auditors reviewed the involved deputy and deputy witness statements, as well as all available corresponding documentation and BWC recordings. The auditors verified the supervising investigators were not partial to deputy statements and completed an objective and thorough investigation by reviewing all available evidence before making a determination.

Findings

For the AV Stations combined, all ten WCSCR investigations (100%) met the criteria for this objective because automatic preference was not given to a deputy's statement over a non-deputy's statement.

For Lancaster Station, all five WCSCR investigations (100%) met the criteria for the objective because automatic preference was not given to a deputy's statement over a non-deputy's statement.

In the prior audit (2024-17-A), for Palmdale Station, all five WCSCR investigations (100%) met the criteria for the objective because automatic preference was not given to a deputy's statement over a non-deputy's statement.

Recommendations

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

Objective No. 2(c) – Preponderance of Evidence

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Management Oversight and Adjudication, Paragraphs 128, 130, 131(partial) & 140(partial), (October 2019), Section 3E states:

3. *LASD will be deemed in substantial **outcomes compliance** when: ...*

*E. For **at least 95%** of public complaints, each significant allegation is adjudicated using the preponderance of evidence standard.*

Procedures

The auditors reviewed all documentation in the completed packets for each of the investigations and all available BWC recordings. The auditors also reviewed the complainant/civilian witness interviews and the involved deputy and deputy witness statements. In addition, the auditors verified each allegation resulting from their review was addressed in the Service Comment Review and was adjudicated using the preponderance of evidence standard. Furthermore, the auditors verified a disposition was documented on the Result of Service Comment Review form for each allegation noted by the auditors.

Findings

For the AV Stations combined, seven of the ten WCSCR investigations (70%) met the criteria for this objective because each significant allegation was adjudicated using the preponderance of evidence standard.

For Lancaster Station, four of the five WCSCR investigations (80%) met the criteria for this objective because each significant allegation was adjudicated using the preponderance of evidence standard. The following investigation did not meet the criteria:

L-4: The allegation the involved deputy pushed the complainant's son was addressed in the Service Comment Review. However, a disposition regarding the allegation was not recorded in the Service Comment Review or on the Results of Service Comment Review form. In addition, a corrective action was not documented to address the fact the allegation was not adjudicated.

In the prior audit (2024-17-A), for Palmdale Station, three of the five WCSCR investigations (60%) met the criteria for this objective because each significant allegation was adjudicated using the preponderance of evidence standard. The following investigations did not meet the criteria:

P-1: Allegations were made by the complainant that one of the deputies was rude and attempted to fight her. The investigator concluded the deputy's conduct appeared reasonable. However, there did not appear to be evidence supporting or negating the allegation that one of the deputies was rude. The investigator did not conduct all the necessary interviews or collect all the available evidence needed to conduct a thorough investigation and reach a reliable conclusion regarding this allegation. Conducting the necessary interviews could have assisted in collecting the evidence needed to ensure the allegation was investigated and adjudicated using the preponderance of evidence standard.

The auditors also noted the complainant submitted an additional complaint, via e-mail, after the complaint intake interview with the watch commander. The complainant alleged the watch commander did not seem really concerned with the issues discussed during the interview regarding her complaint. A separate WCSCR investigation should have been conducted regarding this allegation.

A corrective action was not documented to address the fact the allegations were not investigated or adjudicated.

P-5: The allegations that the deputy pushed the involved party and used profanity were not addressed in the Service Comment Review or investigated. The necessary evidence should have been collected to address the allegations, conduct a thorough investigation, and reach a reliable conclusion for the investigation using the preponderance of evidence standard.

A corrective action was not documented to address the fact the allegations were not investigated or adjudicated.

Recommendations

It is recommended Unit Commanders thoroughly review WCSCR investigations to adjudicate the investigations based upon the preponderance of the evidence standard. Division Commanders should take documented corrective action when a Unit Commander fails to properly review an investigation.

Objective No. 2(d) – Timeliness of Adjudication

Criteria

There is no specific compliance metrics for sub-objective 2(d), “Timeliness of Adjudication.” The current, approved SCR Handbook (June 2011) and the Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), indicate a 30-day timeline to submit the completed WCSCR investigation packet to Division and a 60-day timeline to submit the completed WCSCR investigation packet to the Discovery Unit.

The SCR Handbook is currently being revised to propose a 60-day timeline for submission to the Division and a 90-day timeline to the Discovery Unit. Per discussions with the MT, the auditors agreed to utilize the draft SCR Handbook proposed timelines as the standard for evaluating the timeliness of WCSCR investigations for this audit.

Procedures

To determine whether each of the WCSCR investigations reviewed were submitted to Division within the 60-day requirement, the auditors calculated the number of days from the complaint report date on the WCSCR to the Unit Commander’s approval date on the Results of Service Comment Review form.

To determine whether each of the WCSCR investigations reviewed were submitted to the Discovery Unit within the 90-day requirement, the auditors calculated the number of days from the complaint report date to the Division Commander’s approval date on the Results of Service Comment Review form.

The auditors also determined how long it took the investigator, Operations, and the Division Aide to review the WCSCR investigations.

Findings

For the AV Stations combined, two of the ten WCSCR investigations (20%) met the criteria for this objective because the WCSCR investigation was submitted to the Division within the proposed 60-day timeline requirement. In addition, none of the ten investigations (0%) were submitted to the Discovery Unit within the 90-day timeline requirement.

For Lancaster Station, none of the five WCSCR investigations (0%) met the criteria for this objective because the investigation was not submitted to the Division or to the Discovery Unit within the required timeframes.

The WCSCR investigations were approved an average of 130 days beyond the 60-day timeline requirement and an average of 134 days beyond the 90-day timeline requirement.

In addition, significant delays were noted in the reviews conducted by the investigators, Operations staff, and the Division Aide. Specifically:

- The investigators took an average of 143 days to complete the WCSCR investigations.
- Operations staff completed their reviews in an average of 163 days.
- The Division Aide completed their reviews in an average of 74 days.

The auditors noted the following Lancaster Station:

Table No. 3 – Days Taken to Complete or Approve the Lancaster Station Investigations at Each Level of Review

Investigation	Days with the Investigator	Days with Unit Commander	Days with Division	Days Submitted Beyond the 60-Day Requirement	Days Submitted Beyond the 90-Day Requirement
L-1	228	53	45	221	236
L-2	226	8	34	174	178
L-3	206	8	33	154	157
L-4	34	83	25	57	52
L-5	19	83	35	42	47

In the prior audit (2024-17-A), for Palmdale Station, two of the five WCSCR investigations (40%) met the criteria for this objective because they were submitted to the Division within the proposed 60-day timeline requirement. However, none of the five WCSCR investigations (0%) were submitted to the Discovery Unit within the 90-day timeline requirement.

The WCSCR investigations were approved an average of 64 days beyond the 60-day timeline requirement and an average of 42 days beyond the 90-day timeline requirement.

It appears there is a significant delay in Operations and the Division Aide completing their review of the investigation. Specifically:

- The investigators took an average of 19 days to complete the WCSCR investigations.
- Operations staff completed their reviews in an average of 56 days.
- The Division Aide completed their reviews in an average of 47 days.

The auditors noted the following for Palmdale Station:

Table No. 4 – Days Taken to Complete or Approve the Palmdale Station Investigations at Each Level of Review

Investigation	Days with the Investigator	Days with Unit Commander	Days with Division	Days Submitted Beyond the 60-Day Requirement	Days Submitted Beyond the 90-Day Requirement
P-1	28	98	39	66	75
P-2	13	106	38	59	67
P-3	37	91	1	68	38
P-4	1	52	56	0	18
P-5	18	27	56	0	11

Recommendations

It is recommended the Department implement the revised timelines in the proposed draft SCR Handbook. This may help ensure investigations are thorough and complete prior to submission to the Unit Commander as well as to the Division.

In addition, it is recommended the AV Stations conduct an analysis to determine the main cause of the investigators, Operations, and the Division Aide delays in completing the investigations in a timely manner. It is also recommended an internal tracker be developed to monitor the completion status of the WCSCR investigation at each level of review.

Objective No. 2(e) – Recordation of Critical Information on the Results of Service Comment Review Form

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Management Oversight and Adjudication, Paragraphs 128, 130, 131(partial) & 140(partial), (October 2019), Section 3F states:

3. *LASD will be deemed in substantial **outcomes compliance** when: ...*

*F. **In at least 95%** of public complaints, critical information is recorded accurately in the Service Comment Review packet... Critical information includes all accused employees, allegations of significant misconduct, disposition of each allegation and any corrective action recommended or taken.*

Procedures

The auditors reviewed the critical information on the Results of Service Comment Review forms and compared this information to the corresponding information, BWC recordings, and audio recordings, as well as in PRMS to ensure the accuracy of the critical information recorded on the Results of Service Comment Review. For example, per the MT, if the disposition on the Result of Service Comment Review was “Employee Conduct Appears Reasonable” but the auditors determined the disposition should have been “Appears Employee Conduct Could Have Been Better”, the investigation was noncompliant because the disposition was not accurately recorded on the Results of Service Comment Review.

Findings

For the AV Stations combined, seven of the ten WCSCR investigations (70%) met the criteria for this objective because all critical information was recorded accurately on the Results of Service Comment Review form.

For Lancaster Station, four of the five WCSCR investigations (80%) met the criteria for this objective because all critical information was recorded accurately on the Results of Service Comment Review form. The following investigation did not meet the criteria:

L-4: The allegation that the involved deputy pushed the complainant’s son was addressed in the Service Comment Review. However, a disposition regarding the allegation was not recorded in the Service Comment Review or on the Results of Service Comment Review form.

In the prior audit (2024-17-A), for Palmdale Station, three of the five WCSCR investigations (60%) met the criteria for this objective because all critical information was recorded accurately on the Results of Service Comment Review form. The following investigations did not meet the criteria:

P-1: There did not appear to be evidence to support or refute the allegation that one of the involved personnel was rude. A disposition was not recorded on a Results of Service Comment Review form for this allegation.

In addition, because the investigator did not investigate the allegation that the watch commander did not seem really concerned with the issues discussed during the complaint intake interview, a disposition was not recorded on a Results of Service Comment Review form for this allegation.

P-5: Since the investigator did not address the allegation, the involved personnel pushed the involved party and used profanity, a disposition was not recorded on a Results of Service Comment Review form for this allegation.

Recommendations

It is recommended all levels of personnel responsible for processing complaints, from initial intake to final disposition, take ownership of all critical information obtained in the WCSCR. The Division Commanders should take documented corrective actions when inaccuracies are not corrected.

Objective No. 2(f) – Recordation of Non-Critical Information on the Results of Service Comment Review Form

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Management Oversight and Adjudication, Paragraphs 128, 130, 131(partial) & 140(partial), (October 2019), Section 3G states:

3. *LASD will be deemed in substantial **outcomes compliance** when: ...*

*G. **In at least 80%** of public complaints, non-critical information is recorded accurately on the Results of Service Comment Review form.*

Procedures

The auditors reviewed the non-critical information on the Results of Service Comment Review forms and compared this information to the corresponding information, BWC recordings, and audio recordings, as well as in PRMS to ensure all non-critical information was accurately recorded on the Results of Service Comment Review. In addition, if there were any differences among the non-critical data recorded, the auditors determined which data was accurate.

Findings

For the AV Stations combined, five of the ten WCSCR investigations (50%) met the criteria for this objective because all non-critical information was recorded accurately on the Results of Service Comment Review form.

For Lancaster Station, one of the five WCSCR investigations (20%) met the criteria for this objective because all non-critical information was recorded accurately on the Results of Service Comment Review form. The following investigations did not meet the criteria:

L-1 to L-3 and L-5: The report date on the Results of Service Comment Review and the WCSCR differed from the date on the complaint form submitted by the complainant. The date on the complaint form is the date the WCSCR should have been initiated.

In the prior audit (2024-17-A), for Palmdale Station, four of the five WCSCR investigations (80%) met the criteria for this objective because all non-critical information was recorded accurately on the Results of Service Comment Review form. The following investigation did not meet the criteria:

P-2: The report date on the Results of Service Comment Review and the WCSCR differed from the report date recorded in PRMS. The date on the complaint intake video is the date the complaint was taken which corresponds to the report date in PRMS.

Recommendations

It is recommended specific guidelines be put in place for unit-level Operations staff tasked with reviewing and distributing the completed WCSCR packets. Additional training on accurately transcribing all “non-critical information” on the Results of Service Comment Review form would assist in correcting errors currently found on completed packets. It is also recommended a second level of review be implemented once the form is completed by Operations staff.

Lastly, it is recommended the Results of Service Comment Review form should indicate who completed the form up to the final approval stages. Adding a first and second level signature line would help establish accountability and ensure accurate information in PRMS.

Objective No. 2(g) – Recordation of Critical Information in PRMS

Criteria

Agreement Paragraph 142 states:

LASD-AV will ensure that PPI¹⁰ data is accurate and hold responsible AV personnel accountable for inaccuracies in any data entered.

Per discussions with the MT, the compliance metrics for this sub-objective is 95%.

Procedures

The auditors reviewed the Service Comment module of PRMS to determine if all critical information from the Results of Service Comment Review form was accurately recorded in PRMS. Specifically, the auditors reviewed the critical information on the Result of Service Comment Review forms and ensured it matched the information in PRMS.

Findings

For the AV Stations combined, all ten WCSCR investigations (100%) met the criteria for this objective because all critical information from the Results of Service Comment Review form was accurately recorded in PRMS.

For Lancaster Station, all five WCSCR investigations (100%) met the criteria for the objective because all critical information from the Results of Service Comment Review form was accurately recorded in PRMS.

In the prior audit (2024-17-A), for Palmdale Station, all five WCSCR investigations (100%) met the criteria for the objective because all critical information from the Results of Service Comment Review form was accurately recorded in PRMS.

Recommendations

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

¹⁰ PRMS is formerly known as the Personal Performance Index (PPI).

Objective No. 2(h) – Recordation of Non-Critical Information in PRMS

Criteria

Agreement Paragraph 142 states:

LASD-AV will ensure that PPI data is accurate and hold responsible AV personnel accountable for inaccuracies in any data entered.

Per discussions with the MT, the compliance metrics for this sub-objective is 80%.

Procedures

The auditors reviewed the Service Comment module of PRMS to determine if all non-critical information from the Results of Service Comment Review form was accurately recorded in PRMS. Specifically, the auditors reviewed the non-critical information on the Result of Service Comment Reviews and ensured it matched the information in PRMS.

Findings

For the AV Stations combined, all ten WCSCR investigations (100%) met the criteria for this objective because all non-critical information from the Results of Service Comment Review form was accurately recorded in PRMS.

For Lancaster Station, all five WCSCR investigations (100%) met the criteria for the objective because all non-critical information from the Results of Service Comment Review form was accurately recorded in PRMS.

In the prior audit (2024-17-A), for Palmdale Station, all five WCSCR investigations (100%) met the criteria for the objective because all non-critical information from the Results of Service Comment Review form was accurately recorded in PRMS.

Recommendations

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

CONCLUSION

The AAB conducted prior audit 2024-17-A which resulted in a 0% compliance rate for Lancaster Station because the Station did not complete any WCSCR investigations during the audit time period. The AV Stations, measured as a whole, did not meet the compliance metrics for any of the applicable sub-objectives.

Subsequent to the completion of 2024-25-A, Public Complaints Audit Part III, Lancaster Station had completed WCSCR investigations for the audit time period and the findings are summarized in this audit report (2024-17-S). In addition, the Palmdale Station audit findings and compliance rates for 2024-17-A are reported in this supplemental report and, as a result, compliance rates for the AV Stations have since been updated.

Consideration was given that Lancaster Station had prior knowledge of the supplemental audit which could potentially affect the audit results. Additional factors, such as the complexity of the WCSCR investigations and staffing shortages, may have contributed to the timely completion of the WCSCR investigations. The nature of these investigations may have also 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.

The AV Stations effectively applied the procedures mandated by the Agreement and met the compliance metrics for 11 of the 18 applicable sub-objectives. The audit also identified several areas where improvement by AV Stations is needed such as conducting complainant interviews in-person and timely adjudication of WCSCR investigations. The AV Stations received their lowest compliance rates for each of these sub-objectives ranging from a 0% to a 33% compliance rate. Conducting interviews in-person will provide the investigator with the opportunity to collect the necessary details to complete a thorough investigation. In addition, the auditors strongly suggest the AV Stations address the issues regarding the timely adjudication of investigations. The underlying issues surrounding delays appear to be with the investigators, Operations staff, and the Division Aide.

The AAB believes addressing the findings and implementing the recommendations will ensure prompt corrective actions for all out of compliance sub-objectives. This may improve the AV Station's overall compliance with the Department policies, the stipulations set forth in the Agreement, and the compliance metrics.

RECOMMENDATIONS

The main purpose of this report is to provide recommendations aimed at improving compliance with the Agreement, reducing risk for the Department, and building trust within the community. The AAB makes the following recommendations:

Objective No. 1 – Investigation of Complaints

- a) **Identify Everyone at the Scene:** It is recommended the proper identification of all individuals at the incident scene be documented on the WCSCR, Service Comment Review, and on a complaint investigation checklist. This checklist should be created by the Compliance Unit and utilized during the WCSCR investigation. It should detail the requirements of the Agreement and the compliance metrics. Additionally, Department policy requirements should be added as necessary. This checklist should be available to both AV Stations and required for each WCSCR investigation. It should remain attached to the investigation package and be evaluated during the management review and oversight process.
- c) **Interview Complainant In-Person:** It is recommended the justification as to why it was not practical to conduct an interview in-person be documented on the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a).
- d) **Witness Interview Requirements:** It is recommended investigators obtain written statements or conduct interviews of all the Department and non-department witnesses. It is also recommended the justification as to why a written statement was not obtained from a Department or non-department witness or why an interview was not conducted be documented on the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a).
- e) **Additional Interviews Conducted as Needed:** It is recommended investigators always conduct and document the additional interviews needed to ensure that all the necessary information is collected and supported by sufficient and reliable sources in the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a).
- j) **Collect All Evidence:** It is recommended the collection, organization, and review of all evidence be documented on the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a). The evidence collected must be sufficient and relevant to formulate and support logical conclusions for each allegation.
- k) **Thoroughness of Investigation;** It is recommended investigators consider all related evidence, including but not limited to complainant and witness interviews, booking paperwork, crime and supplemental reports, and BWC recordings when conducting an investigation.

Objective No. 2 – Management Review and Oversight

- c) **Preponderance of Evidence:** It is recommended Unit Commanders thoroughly review WCSCR investigations to adjudicate the investigations based upon the preponderance of the evidence standard. Division Commanders should take documented corrective action when a Unit Commander fails to properly review an investigation.
- d) **Timeliness of Adjudication:** It is recommended the Department implement the revised timelines in the proposed draft SCR Handbook. This may help ensure investigations are thorough and complete prior to submission to the Unit Commander as well as to the Division.

In addition, it is recommended the AV Stations conduct an analysis to determine the main cause of the investigators, Operations, and the Division Aide delays in completing the investigations in a timely manner. It is also recommended an internal tracker be developed to monitor the completion status of the WCSCR investigation at each level of review.

- e) **Recordation of Critical Information on the Results of Service Comment Review Form:** It is recommended all levels of personnel responsible for processing complaints, from initial intake to final disposition, take ownership of all critical information obtained in the WCSCR. The Division Commanders should take documented corrective actions when inaccuracies are not corrected.
- f) **Recordation of Non-Critical Information on the Results of Service Comment Review Form:** It is recommended specific guidelines be put in place for unit-level Operations staff tasked with reviewing and distributing the completed WCSCR packets. Additional training on accurately transcribing all “non-critical information” on the Results of Service Comment Review form would assist in correcting errors currently found on completed packets. It is also recommended a second level of review be implemented once the form is completed by Operations staff.

Lastly, it is recommended the Results of Service Comment Review form should indicate who completed the form up to the final approval stages. Adding a first and second level signature line would help establish accountability and ensure accurate information in PRMS.

Comprehensive Review

The AAB will conduct a comprehensive review of the findings noted during the three individual audits (2024-6-A, 2024-17-S, and 2024-25-S) conducted for the Public Complaints Audit Part III. 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 the issuance of 2024-25-S.

Follow-up Procedures

Within 60 days of distributing the comprehensive review report 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

- LASD.Evidence.com
- Performance Recording and Monitoring System (PRMS)
- Station/Bureau Administration Portal (SBAP)

REFERENCES

- Administrative Investigations Handbook (October 2005)
- 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:
 - 3-04/010.05, Procedures for Department Service Reviews (December 2013)
 - 3-04/010.25, Personnel Complaints (October 2014)
 - 3-10/108.00, Allegation of Misconduct (June 2012)
- Part III of Public Complaints Audit, Investigation and Management Review and Oversight of Public Complaints, Antelope Valley Stations, Project No. 2024-17-A
- Proposed Draft Service Comment Report Handbook (August 2022)
- 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 June 5, 2024, Palmdale Station command staff submitted a response to the AAB concurring with several of the corresponding audit findings for 2024-17-A. On October 18, 2024, Lancaster Station agreed with the corresponding audit findings for this supplemental audit and has started implementing corrective action. The AAB presented the final audit report to the Division Director, Office of Constitutional Policing.



11/21/24

GEOFFREY N. CHADWICK

DATE

Captain

Audit and Accountability Bureau

Los Angeles County Sheriff's Department