LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

AUDIT AND ACCOUNTABILITY BUREAU

Public Complaints

Audit Recommendations Follow-Up Report

Antelope Valley Stations
Project No. 2025-1-R

2025

Robert G. Luna, Sheriff

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Los Angeles County Sheriff's Department
Audit and Accountability Bureau

Parts I, II, and III of Public Complaints Audits: Audit Recommendations Follow-Up Report Antelope Valley Stations Project No. 2025–1–R

INTRODUCTION

The mission at the Audit and Accountability Bureau (AAB) is to conduct law enforcement performance audits, as an internal control for the Los Angeles County Sheriff's Department (LASD or the Department).

The AAB produced the Audit Recommendation Follow-Up Report (follow-up report) as part of the AAB's accountability mission and organizational independence. The AAB obtains and tracks the status of Comprehensive Review Report (review) recommendations from the auditee(s) and reports all findings with impartiality. Upon request, the AAB provides the auditee(s) with clarity regarding their respective audit recommendations. However, the AAB does not provide input as to what actions should be taken to address the recommendations contained within the audits.

This report is generated to encompass all recommendations from January 1, 2024, through January 31, 2025, pertaining to public complaints. During this reporting period, twelve (12) audits were completed. Additionally, three (3) reviews were conducted, resulting in a total of twenty-eight (28) recommendations made by the AAB.
After the AAB issues its recommendations, it then tracks the status of these recommendations from the date of publication to the date they are deemed implemented or not implemented. The AAB produces a follow-up report to provide a comprehensive overview of the Department's progress in addressing the recommendations provided, in alignment with the AAB's aforementioned organizational independence.

Additional ongoing reviews were conducted for Stops and Detentions and Use of Force, in accordance with the United States Department of Justice (DOJ) Antelope Valley (AV) Settlement Agreement (Agreement) and are addressed in subsequent follow-up reports.

BACKGROUND

The County of Los Angeles, the Department, and the DOJ entered into the Agreement on April 28, 2015, with the goal of ensuring police services are provided to the AV community in a manner which fully complies with the Constitution and the laws of The United States. The Department is expected to implement the mandated stipulations of the Agreement to effectively ensure both public and deputy safety, while fostering renewed public confidence in the LASD.

The AAB was authorized by the Sheriff of Los Angeles County, the DOJ, and the Monitoring Team (MT) to conduct audits of the Department's public complaints process. To improve efficiency and effectiveness, the AAB shifted its audit approach from conducting full-scale audits to limited scope audits, focusing on a narrow set of audit objectives and specific audit populations. This refined approach seeks to provide timely feedback to the AV Stations, facilitate opportunities for operational improvement, and demonstrate an increasing commitment toward compliance.

The **Public Complaints Audits** were conducted as follows:

Public Complaints Audits

Part	Audit
I	Assessment of Availability and Acceptance of Complaint Information
II	Initiating and Classifying of Public Complaints
III	Investigation and Management Review & Oversight of Public Complaints

Each part of the Public Complaints Audits targeted a specific paragraph of the Agreement. When combined, these audits provided a comprehensive evaluation of all required aspects of the Agreement.

The table below lists the Public Complaints Audits conducted, their respective project numbers, report type, and completion dates.

Completed Audits in this Audit Recommendation Follow-Up Report

Part	Audit	Project No.	Report Type	Completion Date
I	Assessment of Availability and Acceptance of Public Complaint Information	2024-2-A	Audit	04/18/24
		2024-23-A	Audit	10/10/24
		2024-41-A	Comprehensive Review	02/11/25
II	Initiating and Classifying Public Complaints	2024-1-A	Audit	05/16/24
		2024-16-A	Audit	06/27/24
		2024-16-S	Supplemental Audit	11/21/24
		2024-24-A	Audit	09/03/24
		2024-24-S	Supplemental Audit	12/05/24
		2024-43-A	Comprehensive Review	02/11/25
III	Investigation and Management Review & Oversight of Public Complaints	2024-6-A	Audit	04/19/24
		2024-17-A	Audit	06/27/24
		2024-17-S	Supplemental Audit	11/21/24
		2024-25-A	Audit	08/26/24
		2024-25-S	Supplemental Audit	12/05/24
		2024-45-A	Comprehensive Review	02/11/25

The reviews provided an analysis of the AV Stations' performance for each sub-objective over the course of the completed audits. The reviews showed the areas where the AV Stations met the established compliance metrics and displayed continuous progression, as well as the areas requiring further enhancement. Data patterns, trends, and observations were also identified. These reviews assist the AV Stations in optimizing operations, mitigating risks, and progressing toward fulfilling the requirements of the Agreement.

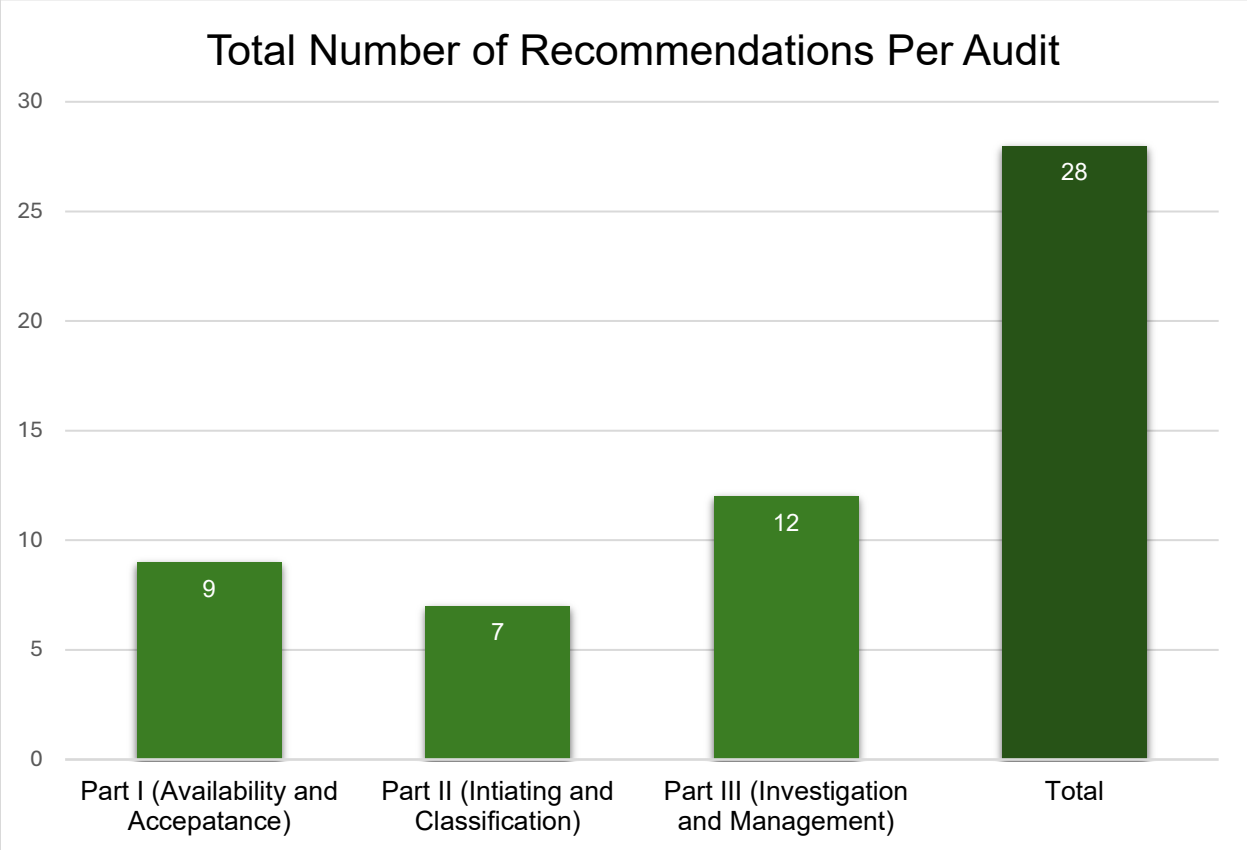
RECOMMENDATIONS

RECOMMENDATION TERMS

Audit recommendations are the corrective actions suggested by the auditor to improve performance, efficiency, compliance, and reduce risk management liabilities for the Department. The recommendations are intended to represent the needs of the stakeholder community and improve the relationship between the public and the Department.

The bar chart below displays the total number of recommendations per part for the Public Complaints Audits.

Total Recommendations Per Audit



CLASSIFICATION OF RECOMMENDATIONS

As part of the Department's commitment to continuous improvement, the AAB categorized the status of each recommendation into four classifications: ***Implemented***, ***In Progress***, ***Ongoing***, and ***Not Implemented***.

The visual aids reflected in the Classification of Recommendations table below provide a clear and concise overview of these classifications for the reporting period. This enables stakeholders to easily track progress and evaluate the extent to which corrective actions have been taken.

Classification of Recommendations

Icon	Status	Definition
	Implemented	Corrective action has been taken to address a recommendation deficiency to improve performance, efficiency, and reduce liabilities for the Department. Management has provided proof of recommendation implementation.
	In Progress	Management has begun taking action to address noted audit deficiencies; however, it has not been deemed complete. The corrective action is still in progress.
	Ongoing	Management has provided a corrective action response requiring further follow-up on recommendation status and re-evaluation of the progress toward addressing a noted deficiency.
	Not Implemented	No corrective action has been taken by management. Management has either disagreed with the recommendation or is unable to implement it due to factors such as resources or cost. No further action will be reported.

DEFINITION OF STATUS

Implemented

Recommendations in this category have been deemed implemented. Details on the progress made toward implementing each recommendation may include corrective action plans, recurrent briefings, proof of training, or changes to policy. Implemented corrective action ensures that recommendations are effective and sustainable.

In Progress

A recommendation has been deemed in progress based on the status information provided. Each recommendation is discussed with the auditee, including the original due date, and any planned actions or reasons for delay.

In progress recommendations have begun to be implemented by management; however, they have not been fully completed due to various factors including resource constraints, scheduling conflicts, and prioritization of other ongoing projects. Detailed plans are in place to initiate and complete these recommendations within specific timeframes. Continuous monitoring and update requests will be conducted to ensure progress and timely completion.

Ongoing

A recommendation has been deemed ongoing based on the status information provided. An ongoing status designation for an audit recommendation is typically associated with those recommendations requiring more time or ongoing processes to complete and implement. These recommendations cannot be implemented in a short period of time due to varying issues such as staffing, cost, and available technology.

Not Implemented

A recommendation has been deemed not implemented if:

- Management disagrees: Management has made the decision not to implement the recommendation. No further action will be reported.

- Unable to implement: Management reported they were unable to implement the recommendation due to lack of resources or cost. No further action will be reported.

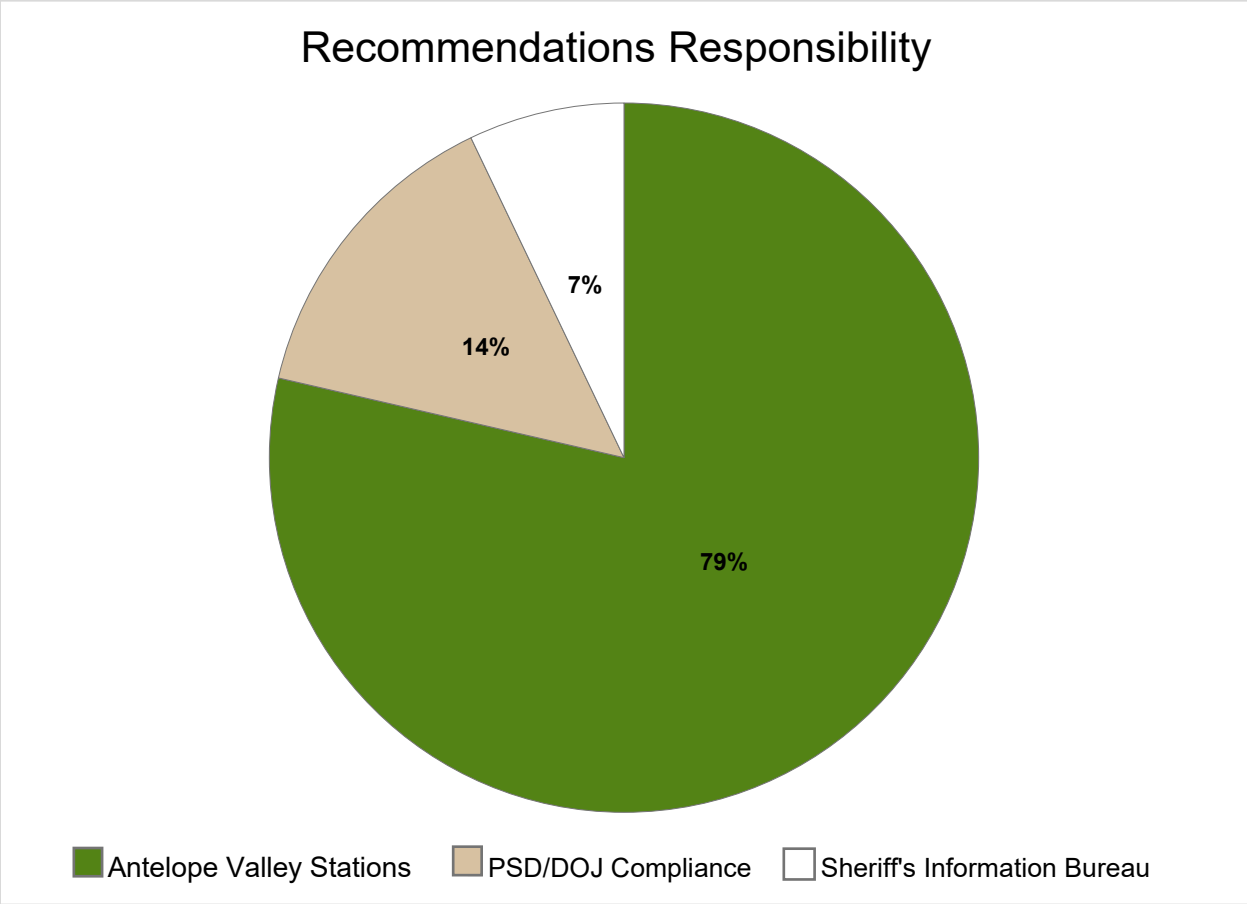
The table below provides a summary of the Public Complaints Comprehensive Review Reports, including the associated project numbers and the implementation status of each recommendation.

Summary of Total Recommendations

Part	Audit	Project No.	Implemented	In-Progress	Not Implemented	Completion %
I	*Assessment of Availability and Acceptance of Complaint Information*	2024-41-A	7	2	0	78%
II	*Initiating and Classifying of Public Complaints*	2024-43-A	5	2	0	71%
III	*Investigation and Management Review & Oversight of Public Complaints*	2024-45-A	10	2	0	83%

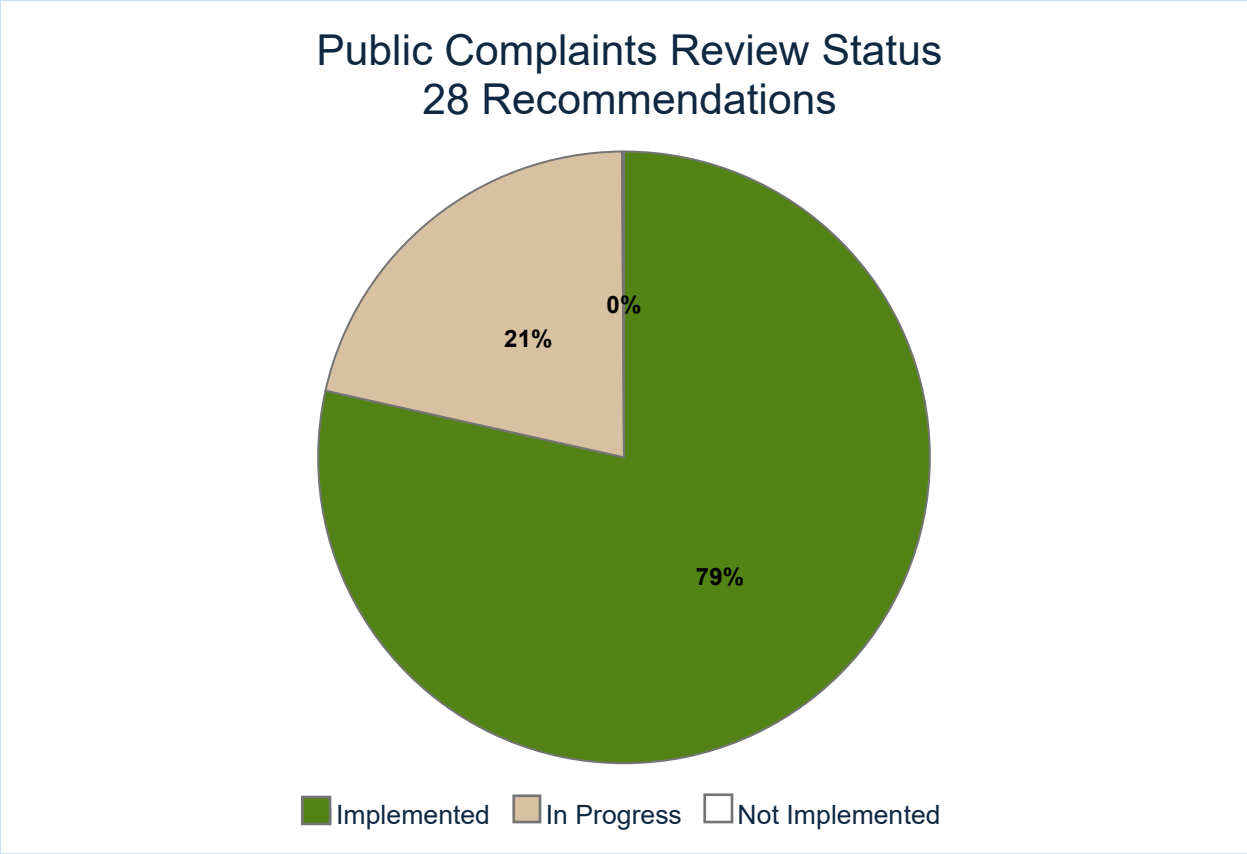
The pie chart below demonstrates Public Complaints Audits' recommendations responsibility by unit.

Public Complaints Recommendations Responsibility Per Unit



Management Response

Summary of Public Complaints Recommendations Status



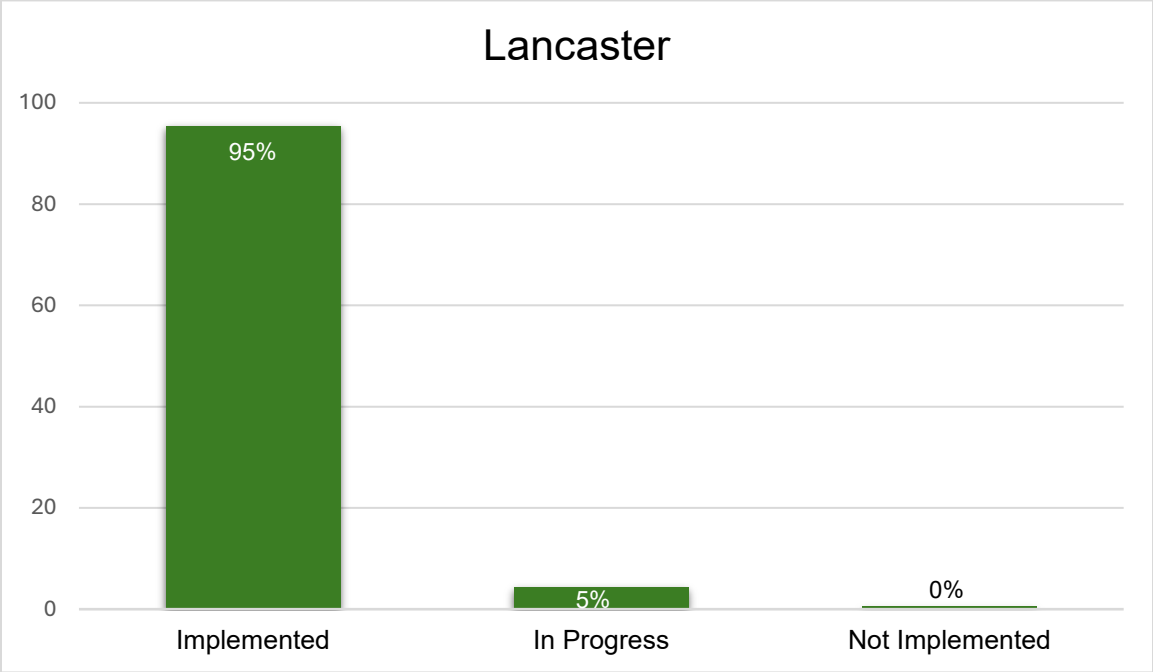
A total of 28 recommendations were identified through the Public Complaints Audits. Of these, 20 applied directly to both AV Stations, with an additional two recommendations requiring joint responses with other Department units. The remaining six recommendations involved the Professional Standards Division (PSD), the Department of Justice Compliance Unit (Compliance Unit), and the Sheriff's Information Bureau (SIB).

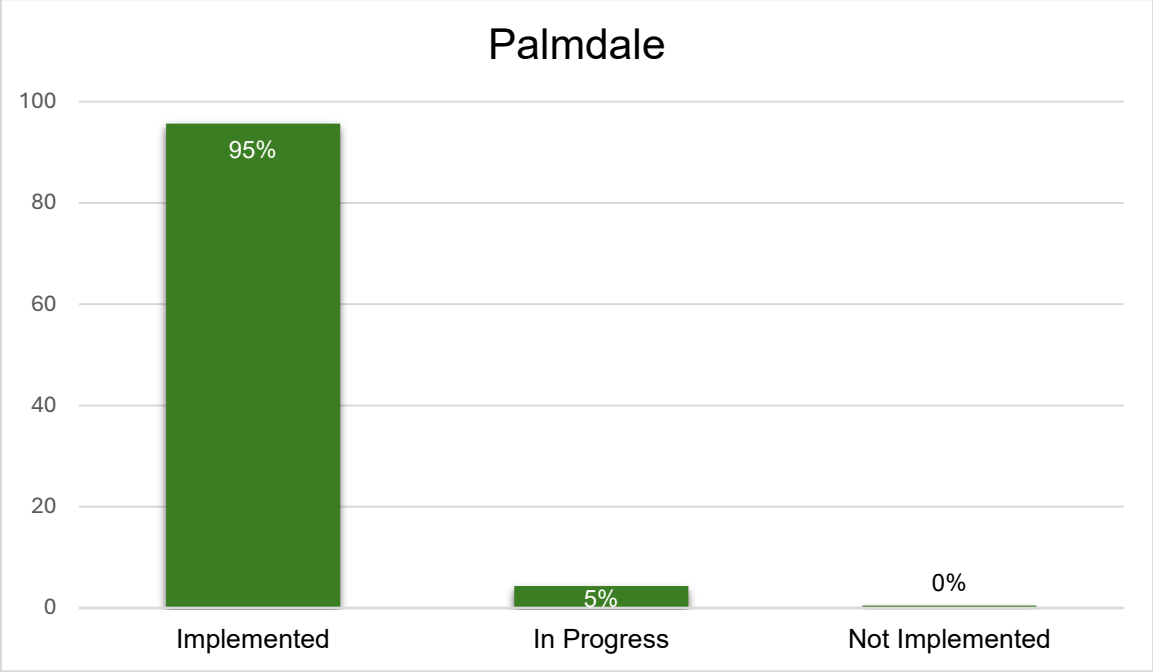
In instances where differing statuses for the same recommendation were reported, the lower completion status was recorded to maintain consistency and accountability.

The progress and compliance status of all recommendations is detailed in the narrative section of the recommendations tracker.

The charts below depict the individual status of Public Complaints Audits' recommendations for the AV Stations (based on 22 applicable recommendations).

Recommendations Status for Each AV Station





Recommendations Responses

Audit Recommendation Follow-Up Report
Recommendations for the Public Complaints Comprehensive Review Report
Antelope Valley Stations
May 2025

Part I - Assessment of Availability and Acceptance of Complaint Information
Project No. 2024-41-A

Recommendation 1	
Objective 2(a) - Mail-in Form	Status
It is recommended the AV Stations and PSD establish a tracking system for public complaints submitted to various locations. This system should log and distribute the complaints to the appropriate party within the Department.	✓

Response to Recommendation 1

Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)

DOJ Compliance

The Los Angeles County Sheriff's Department (LASD) currently operates an internally developed, 11-year-old, Oracle-based legacy system known as PRMS. The Department seeks to replace PRMS with a modern, web-based risk management and training system that provides key functionalities, including case initiation, approval, review, and archiving. Additional required features include case routing, electronic forms (e-Forms), automated system alerts, Senate Bill 2 reporting and tracking, training tracking, and business intelligence capabilities for executive dashboards optimized for tablet use.

The Department is in the process of seeking a replacement for the PRMS system. The new system must feature automated instant notifications to stations and units, with notification levels tailored to rank.

Additionally, the system must provide enhanced tracking capabilities, allowing for the logging and monitoring of individuals who complete, review, and approve complaints or use-of-force incidents. Implementing a new risk management system may also necessitate adjustments to the SCR handbook, including potential modifications to timeline requirements.

PSD

The Department uses the Performance Recording and Monitoring System (PRMS) for administrative paperwork. All complaints are required to be entered into the PRMS system. A trackable Service Comment Report (SCR) number is issued upon entry. Each station should also use the Station/Bureau Admin Portal (SBAP) which tracks the timelines of administrative paperwork, including service comment reports (complaints). Both systems are auditable. The original report is sent to the handling unit via county mail if it was submitted at a different location. The Department does not have a memorialized process to forward a scanned version of the complaint via email or shared file at this time, although that would be considered best practice and IAB does follow this procedure.

If PSD receives a mailed-in complaint, we log the mail in a tracker and indicate the date received and the date it is forwarded to IAB (usually the same day). IAB will transfer the information to a WCSCR and forward the original letter and the SCR form to the handling unit via county mail. A SCR number and SB2 number will be drawn as required. IAB then scans the complaint into a PDF and sends it as an attachment in an email that notifies the handling station of the complaint being sent through the county mail.

Palmdale

Palmdale uses the Risk Management Tracker within the SBAP system. Any WCSCR input into the system receives a risk management identifier. The Captain's Secretary utilizes an internal tracker for workflow.

Lancaster

We utilize the Risk Management Tracker within SBAP and the Captain's Secretary also uses an internal tracker for workflow. Any WCSCR received gets assigned a risk management identifier.

Recommendation 2	
Objective 2(a) - Mail-in Form	Status
It is recommended the PSD email a copy of the mail-in complaint form and the WCSCR to the relevant stations, along with sending the original copy through county mail. This will help ensure the complaint is investigated within the required five business day timeframe. Furthermore, it is recommended that any Department member who fails to accept a complaint receive documented corrective action.	

Response to Recommendation 2	
Status: **IMPLEMENTED**	(Implemented, Not Implemented, In Progress)

PSD

While IAB does email a copy of any complaint being re-routed through our offices to a handling unit, that is not a written policy in the MPP. It is possible that a complaint could be submitted to the incorrect station or a unit other than PSD or IAB. This should be considered by OCP for a Department-wide MPP policy to ensure compliance.

Failure to carry out supervisory, managerial, or executive duties and responsibilities adequately and promptly is an offense currently in the Department's Discipline Guide (inclusive of civilian or POE complaints). The possible discipline is listed as Written Reprimand through Discharge. See 3-01/030.10 Obedience to Laws, Regulations and Orders, and 3-01/122.05, Policy of Equality, Duties of Supervisors and Managers, Failure to Report. The Discipline Guide is available on the IAB intranet website.

Recommendation 3	
Objective 2(a) - Mail-in Form	Status
It is recommended the Department revise MPP Section 3-09/004.00 - Limited English Proficiency (LEP) and Language Assistance Plan (April 8, 2018). The current policy requires complaint documents to be accessible to LEP individuals. However, it does not require the Department to respond to LEP complainant inquiries in the language submitted by the complainant. To better serve the LEP community and address their concerns regarding the Department efficiently and effectively, the Department shall ensure all complaints are responded to in the language submitted by the complainant. This can/may be accomplished through the use of compensated bilingual Department personnel, certified interpreters, or translation services currently available to the Department.	

Response to Recommendation 3	
Status: **IN PROGRESS**	(Implemented, Not Implemented, In Progress)

PSD

PSD agrees that this is a recommendation that should be addressed by revised policy in the MPP to ensure Department-wide compliance. All policy changes to the MPP must go through the established process that resides within the Office of Constitutional Policing and Field Operations Support Services (now under OCP control). PSD would happily collaborate with OCP on any MPP revisions to this end.

Palmdale

Despite there not being a revised policy, Palmdale Station's operations staff responds to LEP individuals in the language submitted by the complainant.

Lancaster

Although the Department's policy has yet to be revised, Lancaster Station's operations staff responds to LEP individuals in the language submitted by the complainant. We've been practicing this for the past several months.

Recommendation 4 (SIB)	
Objective 2(c) - Department 800 Number	Status
It is recommended the SIB conduct a weekly internal audit of the telephone call logs to identify phone complaints and determine whether they were accepted and processed. The documentation of the weekly audit should be reviewed and approved by the Unit Commander.	
Response to Recommendation 4	
Status: **IN PROGRESS** (Implemented, Not Implemented, In Progress)	
SIB *Currently, there is no way to review "complaint type calls" due to the fact when the caller calls the 1-800 number, the call is forwarded to multiple phone numbers at SIB. The process to review these calls would be extremely time-consuming. We are currently in the process of creating a complaint line only number, to allow for time-effective review of those types of calls. Once this process is completed, a lieutenant will conduct a weekly audit and allow review/approval by the unit commander. The review/approval will be documented on the Watch Commander Log.*	
Recommendation 5 (SIB)	
Objective 2(c) - Department 800 Number	Status
It is recommended SIB train staff to avoid leaving complainants on hold for extended periods if a supervisor is unavailable to take the call. Instead, staff should request the complainant's contact information for a callback.	
Response to Recommendation 5	
Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)	
SIB *We will be re-briefing personnel on FOD 90-003 Handling routine incoming calls/telephone demeanor.*	
Recommendation 6	
Objective 2(d) - AV Station Phones	Status
It is recommended the Department reinforce existing policies with the watch commanders to ensure they accept public complaints and are making concerted efforts to return telephone calls to complainants. Watch commanders should also document all phone complaints, and returned calls in the Watch Commander's Log for accountability and any necessary follow-up.	
Response to Recommendation 6	
Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)	
Palmdale *Reinforced in the "Service Comment Report Expectations" memo dated December 5, 2024, the "Watch Commander Calls / Requests" email dated June 11, 2024, and the "The Use of the Language Line Services for Limited English Proficiency (LEP) Callers" briefing that was disseminated on August 30, 2024, to anyone working as watch commander, including outside overtime personnel.* ***Lancaster*** *Lancaster Station removed the watch commander's voicemail in August of 2023. If there is a request to speak with the watch commander, the line is transferred to the extension. If the watch commander is not available and does not pick up the call, the line transfers back to the desk line. Personnel will then page for the watch commander via the Public Address (PA) system. If the watch commander is still not located, personnel will take a message and deliver it to the watch commander. The operations lieutenant currently performs spot audits of the watch commander logs and phone calls to ensure compliance. Watch commanders are instructed to document their complaint intakes, or reasons for not taking a complaint, in the Watch Commander Log.*	

Recommendation 7	
Objective 2(d) - AV Station Phones	Status
It is also recommended the AV Stations establish a protocol to conduct a weekly internal audit of the Watch Commander's Logs to identify phone complaints and determine whether they were accepted and processed. Any complaints found not to have been accepted should result in documented corrective action. The documentation of the weekly internal audit should be reviewed and approved by the Station's Unit Commander.	

Response to Recommendation 7	
Status: **IMPLEMENTED**	(Implemented, Not Implemented, In Progress)

Palmdale
As per a "Weekly Audits" directive dated April 7, 2025, the Operations Sergeant will audit weekly calls, log entries, and call clearances. Findings will be reported to the Operations Captain on a weekly basis and corrective actions will be taken.

Lancaster
Lancaster Station's watch commanders are required to email the watch commander log after each shift to the watch commander log email distribution group. This includes all lieutenants and sergeants and both captains. The operations captain reviews and conducts a daily audit of every log to ensure proper documentation including any logged complaints, beginning first thing in the morning when the EM log and subsequently Day shift and PM shift logs are checked. There is no formal log, other than a county email record. The operations captain is also responsible for signing all acknowledgement letters for complaints. Additionally, the operations lieutenant conducts random audits. Recently, the operations lieutenant initiated a complaint after one of the audit reviews. A WCSCR number can be looked up if needed. Moving forward our station compliance unit will conduct a formal weekly audit of two telephone calls to the watch commander line. Any concerns will be addressed to the operations lieutenant and captain.

Recommendation 8	
Objective 2 (d) - AV Station Phones	Status
The AAB also recommends the AV Stations train staff to avoid leaving complainants on hold for an extended period of time if a supervisor is unavailable to take the call or when obtaining translation services. Department members should instead request the complainant's contact information for a callback.	

Response to Recommendation 8	
Status: **IMPLEMENTED**	(Implemented, Not Implemented, In Progress)

Palmdale
Reinforced in the "Service Comment Report Expectations" memo dated December 5, 2024, the "Watch Commander Calls / Requests" email dated June 11, 2024, and the "The Use of the Language Line Services for Limited English Proficiency (LEP) Callers" briefing that was disseminated on August 30, 2024, to anyone working as watch commander, including outside overtime personnel.

Lancaster
Although there is no official training, call takers have been reminded through email, and in some instances counseling, of how to properly handle phone calls when the complainant is trying to reach the watch commander or an appropriate supervisor.

Recommendation 9	
Objective 2 (d) - AV Station Phones	Status
It is recommended AV Stations brief personnel on MPP 3-09/004.00 LEP. Department personnel are required to provide accurate and effective communication with members of the public regardless of their level of English proficiency.	
Response to Recommendation 9	
Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)	
Palmdale *"The Use of the Language Line Services for Limited English Proficiency (LEP) Callers" briefing was disseminated on August 30, 2024, to anyone working as watch commander, including outside overtime personnel.* ***Lancaster*** *Lancaster Station's operations staff has reminded our personnel, via email and in-person conversations, of how to properly use the language line to accommodate LEP persons.*	
Recommendations Implemented	***7***
Recommendations in Progress	***2***
Recommendations Not Implemented (Declined, Unable, Already Changed)	***0***
Total Recommendations	***9***

Part II - Initiating and Classifying of Public Complaints Project No. 2024-43-A	
Recommendation 10	
Objective 1(a) - Prompt Initiation of Complaint	Status
It is recommended the AV Stations' command staff create a corrective action plan to address station personnel who have been found to delay the initiation of a WCSCR investigation. These plans may include documenting these violations through informal corrective action counseling or an Administrative Investigation. Additionally, the AV Stations' command staff should ensure all supervisors are aware of and comply with the provisions in the Service Comment Report (SCR) Handbook.	
Response to Recommendation 10	
Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)	
Palmdale *Delineated in the "Service Comment Report Expectations" memo dated December 5, 2024, under the Operations section, stating appropriate corrective action shall be taken if an employee is found to have refused to accept a personnel complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint. Corrective action plans have already been initiated and submitted for those personnel found to have delayed the initiation of a WCSCR investigation.* ***Lancaster*** *On September 6, 2024, Lancaster Station's operations staff provided a detailed email to station sergeants and lieutenants to provide insight into the proper handling of WCSCR investigations. The supervisors were reminded to adhere to the guidelines established in Lancaster Station Unit Order #69, the Settlement Agreement, and the WCSCR Handbook. They were provided with PDF versions of Unit Order #69 and the WCSCR Handbook as a reference. The expectation to promptly initiate public complaints was a topic specifically addressed in the email.* *Lancaster Station is holding supervisors accountable for this metric via counseling and performance log entries for failing to properly initiate a public complaint. Our operations staff has created a checks-and-balances approach to ensure electronic complaints are adequately addressed. The operations sergeant will provide the operations lieutenant and operations captain with a disposition for each public comment received, whether it resulted in a complaint or not. Additionally, the captain's secretary is now time-stamping complaint correspondence received at Lancaster Station.*	

Recommendation 11	
Objective 1(b) - Discouraging or Inhibiting a Complaint	Status
It is recommended the AV Stations' command staff conduct briefings along with documented (APIS rosters) training to ensure their personnel are aware of the provisions in the Agreement, Department policy and the WCSCR Handbook as it relates to the intake of public complaints. Furthermore, an appropriate corrective action plan must be created to address station personnel who have discouraged members of the public from filing a complaint. These violations of the Agreement should be documented in a memorandum to the NPD Chief for their consideration and disposition.	

Response to Recommendation 11	
Status: **IN PROGRESS**	(Implemented, Not Implemented, In Progress)

Palmdale

Regarding the briefings and documented trainings, Palmdale Station is currently developing an in-house training module to ensure station personnel from the Antelope Valley Stations are aware of the provisions in the Settlement Agreement, Department policy, and the WCSCR Handbook as it relates to the intake, investigation, and disposition of public complaints. Regarding the corrective action plan, within the "Service Comment Report Expectations" memo dated December 5, 2024, under the Operations section, appropriate corrective action shall be taken if an employee is found to have refused to accept a personnel complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint. ***IN PROGRESS***

Lancaster

On September 6, 2024, and May 13, 2025, Lancaster Station's operations staff provided a detailed "WCSCR Topics" directive to station sergeants and lieutenants to provide insight on the proper handling of WCSCR investigations. The supervisors were reminded to adhere to the guidelines established in Lancaster Station Unit Order #69, the Settlement Agreement, and the WCSCR Handbook. They were provided with PDF versions of Unit Order #69 and the WCSCR Handbook as a reference. If, through the WCSCR process or other inquiry, personnel are found to have legitimately discouraged a person from filing a complaint, corrective action will be implemented. A training roster for the station's supervisors was completed documenting the occurrence of the training/briefing for the directive contents. ***IMPLEMENTED***

Recommendation 12	
Objective 1(c) - Watch Commander Initiate a WCSCR or Provide Justification in Watch Commander Log	Status
It is recommended the AV Stations' command staff conduct weekly audits of watch commander log entries and phone calls received through the watch commander line to ensure the AV Stations' personnel assigned to that position are properly documenting complaints and non-complaint incidents. The results of these audits should be distributed to the NPD command staff to ensure personnel who are not adhering to the SA provisions are held accountable.	

Response to Recommendation 12	
Status: **IMPLEMENTED**	(Implemented, Not Implemented, In Progress)

Palmdale

As per a "Weekly Audits" directive dated 4/7/25, the Operations Sergeant will audit weekly calls, log entries, and call clearances. Findings will be reported to the Operations Captain on a weekly basis and corrective action will be taken.

Lancaster

As per a "Weekly Audits" directive dated 5/14/25, our station compliance unit will conduct a formal weekly audit of two telephone calls to the watch commander's line as guided by Unit Order #69. Any concerns will be addressed to the operations lieutenant and captain. Refer to Recommendation 7.

Recommendation 13	
Objective 1(c) - Watch Commander Initiate a WCSCR or Provide Justification in Watch Commander Log	Status
It is recommended the AV Stations' command staff recontact the complainants from all three previous audits conducted by the AAB in which a WCSCR investigation was not initiated to accurately document and investigate the allegations.	
Response to Recommendation 13	
Status: **IN PROGRESS** (Implemented, Not Implemented, In Progress)	
Palmdale *Such actions were taken and documented under two Corrective Action Plans to Division Chief for Audits 2024-16,17,24, and 25-S and during which, two complaints were initiated in response to audit 2024-16-S.* ***IMPLEMENTED*** ***Lancaster*** *Lancaster Station will review previous audits and initiate WCSR's for serious allegations of misconduct as needed.* ***IN PROGRESS***	
Recommendation 14	
Objective 1(d) - Field Supervisor's Documentation of Contacts That Did Not Constitute a Complaint	Status
It is recommended the AV Stations' supervisors conduct weekly audits of field sergeants' MDC logs when the 777-clearance code was used to ensure they are properly documenting complaints and non-complaint incidents while out in the field as stated in Palmdale Station Unit Order, 14-06 and Lancaster Station Unit Order 69. These audits should be conducted by personnel assigned to work as the on-duty Watch Commander and document the results in the Watch Commander logs.	
Response to Recommendation 14	
Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)	
Palmdale *As per a "Weekly Audits" directive dated 4/7/25, the Operations Sergeant will audit weekly calls, log entries, and call clearances. Findings will be reported to the Operations Captain on a weekly basis and corrective action taken.* ***Lancaster*** *As per a "Weekly Audits" directive dated 5/14/25, our station compliance unit will conduct a formal weekly audit of two "777" clearances by Lancaster field sergeants as guided by Unit Order #69. Any concerns will be addressed to the operations lieutenant and captain. Refer to Recommendation 7.*	
Recommendation 15	
Objective 1(e) - Identify all Significant Allegations in Complaint	Status
It is recommended the AV Stations command staff thoroughly review all pertinent evidence regarding the intake of complaints. This process will ensure the investigating supervisors accurately identified, document, investigate, and adjudicated each significant allegation made by the complainant in the WCSCR investigation.	
Response to Recommendation 15	
Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)	
Palmdale *Delineated in the "Service Comment Report Expectations" memo dated December 5,2024, under several bullet points contained in the Operations section, as well as the "WCSCR Follow-Up" email dated June 11, 2024.* ***Lancaster*** *As referenced in the email to Lancaster Station sergeants and lieutenants on September 6, 2024, supervisors were provided with a PDF version of Lancaster Unit Order #69 and reminded to abide by its contents.* *The unit order specifically requires supervisors to investigate every allegation of misconduct and accurately classify the allegations. Additionally, the operations staff will place emphasis on improving the quality of each service review to ensure all allegations are addressed, categorized, and documented. This will certify that PRMS entries are properly recorded.*	

Recommendation 16	
Objective 1(f) - Misconduct Alleged in Civil Claims and Lawsuits	Status
It is recommended 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.	
Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)	
Palmdale *Delineated in the "Service Comment Report Expectations" memo dated December 5, 2024, under the Operations section, which ensures all complaints made during a UOF incident, civil claim, or lawsuit are addressed and documented via a WCSCR.* ***Lancaster*** *In certain instances, public allegations of misconduct are only brought to Lancaster Station's attention via civil claim or lawsuit. In those cases, the operations lieutenant will now confer with the operations staff to verify if a WCSCR has been initiated. If warranted, a WCSCR will be initiated if one had not already been taken.*	
Recommendations Implemented	***5***
Recommendations in Progress	***2***
Recommendations Not Implemented (Declined, Unable, Already Changed)	***0***
Total Recommendations	***7***

Part III - Investigation and Management Review & Oversight of Public Complaints
Project No. 2024-45-A

Recommendation 17 (DOJ COMPLIANCE / AV STATIONS)

Objective 1(a) - Identify Everyone at the Scene	Status
It is recommended 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 be required for each WCSCR investigation. It should remain attached to the investigation package and be evaluated during the management review and oversight process.	

Response to Recommendation 17

Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)

DOJ Compliance

The Los Angeles County Sheriff's Department is currently in the process of revising the procedures for handling WCSCR (Watch Commander Service Comment Report) requests. This process includes developing a standardized complaint investigation checklist to ensure consistent documentation and accountability across all stations. The Antelope Valley Stations (Palmdale and Lancaster) are currently using a checklist to capture the required information. However, this checklist will be revised to incorporate the requirements outlined in the Settlement Agreement, relevant compliance metrics, and applicable department policies.
In addition, the technology used to capture WCSCRs is currently being evaluated to improve efficiency, accuracy, and accessibility across the Department.

Palmdale

Referred to and noted in the "Service Comment Report Expectations" memo dated December 5, 2024, and the "WCSCR Follow-Up" email dated June 11, 2024. Palmdale Station also developed its own complaint investigation checklist.

Lancaster

The proper identification of all individuals at the incident scene should be documented on the WCSCR and during the Service Comment Review. Lancaster Station is continually briefing procedures for conducting thorough investigations documented in the WCSCR handbook. These topics were addressed to all sergeants and lieutenants in emails on September 6, 2024, October 11, 2024, and December 6, 2024. The briefing to supervisors also includes Lancaster Station Unit Order #69 (Supplemental Supervisor Responsibilities) and the WCSCR Handbook.

Lancaster Station developed a draft of an internal checklist, pending the creation of an official checklist by the Compliance Unit, as recommended by the audit. The checklist will detail the requirements of the Settlement Agreement and the compliance metrics. Additionally, Department policy requirements should be added as necessary. This checklist will be added to future investigations and evaluated during the management review and oversight process.

Recommendation 18	
Objective 1(c) - Interview Complainant In-Person	Status
When conducting WCSCR investigations, the interview with the complainant must be conducted in person. Meeting with the complainant in-person allows them to feel "heard" and promotes the Department's efforts to fully engage when collecting the necessary details to complete the investigation. However, in accordance with the compliance metrics, if this is not practical, the supervisor conducting the interview must document the reason it was impractical. In addition, the complainant should be asked if the interview can be conducted in-person and if they decline, this serves as justification for not conducting the in-person interview. It is recommended the justification as to why it was not practical to conduct an interview in person is documented on the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a).	

Response to Recommendation 18	
Status: **IMPLEMENTED**	(Implemented, Not Implemented, In Progress)
Palmdale *Referred to and noted in the "Service Comment Report Expectations" memo dated December 5, 2024, "WCSCR Follow-Up" email dated June 11, 2024, "WCSCR Intake and Follow-Up Interviews" email dated August 16, 2024, and the "SCR WC Checklist" email dated December 10, 2024. Instructions are also contained in Palmdale's complaint investigation checklist.* ***Lancaster*** *Lancaster Station is educating our supervisors concerning interviewing the complainants in-person when practical or providing justification otherwise. We have briefed our watch commanders to provide the complainants with an opportunity to come into the station to have their comment received if they desire. If it was impractical to do so, the supervisor has been directed to provide specifics rather than use boilerplate verbiage.* *These topics were addressed to all sergeants and lieutenants in emails on September 6, 2024, October 11, 2024, and December 6, 2024. The briefing to supervisors also includes Lancaster Station Unit Order #69 (Supplemental Supervisor Responsibilities) and the WCSCR Handbook. Additionally, the creation of an internal checklist will ensure investigators document any specific reasons for impracticality.*	

Recommendation 19	
Objective 1(e) - Additional Interviews Conducted as Needed	Status
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).	

Response to Recommendation 19	
Status: **IMPLEMENTED**	(Implemented, Not Implemented, In Progress)
Palmdale *Referred to and noted in the "Service Comment Report Expectations" memo dated December 5, 2024, "WCSCR Follow-Up" email dated June 11, 2024, "WCSCR Intake and Follow-Up Interviews" email dated August 16, 2024, and the "SCR WC Checklist" email dated December 10, 2024. Instructions are also contained in Palmdale's complaint investigation checklist.* ***Lancaster*** *Refer to Recommendation 17. The checklist is being utilized.*	

Recommendation 20	
Objective 1(j) - Collect All Evidence	Status
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 credible conclusions for each allegation.	
Response to Recommendation 20	
Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)	
Palmdale *Referred to and noted in the "Service Comment Report Expectations" memo dated December 5,2024, "WCSCR Follow-Up" email dated June 11, 2024, "WCSCR Intake and Follow-Up Interviews" email dated August 16, 2024, and the "SCR WC Checklist" email dated December 10, 2024. Instructions are also contained in Palmdale's complaint investigation checklist.* ***Lancaster*** *We are utilizing the checklist as described in Recommendation 17. In several emails sent to our supervisors, they have been encouraged to be thorough but concise and provide a factual basis for dispositions. Although Lancaster Station Unit Order #69 reinforces that all allegations need to be identified and addressed, it is imperative for the operations staff to ensure this standard is met during management review. The unit commander and operations sergeant have discussed this in detail.*	
Recommendation 21	
Objective 1(k) - Thoroughness of Investigation	Status
It is recommended all related evidence, including but not limited to complainant and witness interviews, booking paperwork, crime and supplemental reports, and BWC recordings the investigators consider when conducting an investigation to formulate and support logical conclusions for each allegation be documented on the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a).	
Response to Recommendation 21	
Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)	
Palmdale *Referred to and noted in the "Service Comment Report Expectations" memo dated December 5, 2024, "WCSCR Follow-Up" email dated June 11, 2024, "WCSCR Intake and Follow-Up Interviews" email dated August 16, 2024, and the "SCR WC Checklist" email dated December 10, 2024. Instructions are also contained in Palmdale's complaint investigation checklist.* ***Lancaster*** *We are utilizing the checklist as described in Recommendation 17. In several emails sent to our supervisors, they have been encouraged to be thorough but concise and provide a factual basis for dispositions. Although Lancaster Station Unit Order #69 reinforces that all allegations need to be identified and addressed, it is imperative for the operations staff to ensure this standard is met during management review. The unit commander and operations sergeant have discussed this in detail.*	
Recommendation 22	
Objective 2(c) - Preponderance of Evidence	Status
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.	
Response to Recommendation 22	
Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)	
Palmdale *Referred to and noted in the "Service Comment Report Expectations" memo dated December 5,2024.* ***Lancaster*** *Lancaster Station's operations captain thoroughly reviews all WCSCR investigations to ensure they are properly adjudicated without bias, using the preponderance of the evidence standard. The division commander will hold the captain accountable.*	

Recommendation 23 (DOJ COMPLIANCE)	
Objective 2(d) - Timeliness of Adjudication	Status
It is recommended the Department implement the revised timelines in the proposed draft SCR Handbook. The expanded timelines may help ensure investigations are thorough and complete prior to submission to the Unit Commander as well as to Division.	
Response to Recommendation 23	
Status: **IN PROGRESS** (Implemented, Not Implemented, In Progress)	
DOJ Compliance *The Los Angeles County Sheriff's Department is actively reviewing and updating its procedures for managing WCSCR requests. As part of this process, current timelines will be reviewed and potentially modified to provide investigators with sufficient time to complete their investigations thoroughly.*	
Recommendation 24	
Objective 2(d) - Timeliness of Adjudication	Status
In addition, it is recommended the AV Stations conduct an analysis to determine the main cause of the delays in completing the investigations in a timely manner.	
Response to Recommendation 24	
Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)	
Palmdale *The Operations Captain analyzed the workflow process and eliminated the Captain's Secretary from the initial review process for grammar. The workflow is now seamless from the Operations Lieutenant to the Operations Captain. At no fault to the Captain's Secretary, but the WCSCRs were being delayed at her desk while other items took priority.* ***Lancaster*** *Although the Department has not released the updated WCSCR Handbook with the new proposed timeframes, Lancaster is still working to ensure timely completions. This is undoubtedly a work in progress as we are challenged by staffing shortages/impairments at the lieutenant position and lesser-tenured lieutenants/sergeants working as watch commanders that lack either formal training or experience to conduct the inquiries thoroughly and efficiently. We currently track the status of pending WCSCR's via SBAP/RMT.* *We have streamlined the administrative review process within operations; however, it is our goal that through continued educational and training efforts our supervisors will be more capable to submit thorough and timely reviews. Lancaster Station is still offering overtime opportunities for supervisors to complete overdue staff work.*	
Recommendation 25	
Objective 2(d) - Timeliness of Adjudication	Status
It is also recommended an internal tracker is developed to monitor the completion status of the WCSCR investigation at each level of review.	
Response to Recommendation 25	
Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)	
Palmdale *In conjunction with the Operations Lieutenant, the Operations Captain reviews the SBAP Risk Management Tracker report for WCSCRs on a weekly basis and conducts follow-up with handling supervisors past 30 days.* ***Lancaster*** *We utilize the Risk Management Tracker via SBAP. The captain's secretary also uses an internal tracker for workflows.*	

Recommendation 26	
Objective 2(e) - Recordation of Critical Information on the Results of Service Comment Review Form	Status
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. Division Commanders must take documented corrective actions when inaccuracies are not corrected.	
Response to Recommendation 26	
Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)	
Palmdale *Referred to and noted in the "Service Comment Report Expectations" memo dated December 5, 2024, "WCSCR Follow-Up" email dated June 11, 2024, "WCSCR Intake and Follow-Up Interviews" email dated August 16, 2024, and the "SCR WC Checklist" email dated December 10, 2024. Instructions are also contained in Palmdale's complaint investigation checklist.* ***Lancaster*** *Lancaster Station strives to ensure all WCSCR Results of Service Comment Review forms are recorded appropriately. The operations staff is validating accurate information through a checks-and-balances approach.*	
Recommendation 27	
Objective 2(f) - Recordation of Non-Critical Information on the Results of Service Comment Review Form	Status
It is recommended written guidelines are established for unit-level Operations staff who are 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 would assist in correcting errors currently found in completed packets. It is also recommended a second level of review is implemented once the form is completed by Operations staff.	
Response to Recommendation 27	
Status: **IMPLEMENTED** (Implemented, Not Implemented, In Progress)	
Palmdale *Referred to and noted in the "Service Comment Report Expectations" memo dated December 5, 2024.* ***Lancaster*** *The captain's secretary is responsible for reviewing and distributing the WCSCR Results of Service Comment Review Forms, as well as completed WCSCR packets. Our OAI is our back-up. We will validate information through a checks-and- balances approach. There is no formal training; however, she utilizes established written guidelines that were established by persons who previously held that position.*	
Recommendation 28 (DOJ COMPLIANCE)	
Objective 2(f) - Recordation of Non-Critical Information on the Results of Service Comment Review Form	Status
It is recommended the Results of Service Comment Review form 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.	
Response to Recommendation 28	
Status: **IN PROGRESS** (Implemented, Not Implemented, In Progress)	
DOJ Compliance *As the Los Angeles County Sheriff's Department reviews current WCSCR procedures and documentation, the Results of Service Comment Review form will also be evaluated for possible modifications to capture all levels of review. This will allow for greater transparency and accountability in the approval process and help ensure that accurate and complete information is recorded in PRMS.*	

Recommendations Implemented	***10***
Recommendations in Progress	***2***
Recommendations Not Implemented (Declined, Unable, Already Changed)	***0***
Total Recommendations	***12***

OBSERVATION

Several recommendations from the Comprehensive Review Report have identified the need for significant improvements in the Department's public complaint tracking and management processes. Specifically, the report emphasized the necessity for a more effective system to track public complaints, more efficient databases to support internal audits and ensure adherence to established protocols and streamlined complaint distribution procedures to enable prompt and timely investigations.

The Department's ability to meet these standards is currently limited by the use of outdated technology and database systems. At present, the Department relies on an internally developed, 11-year-old Oracle-based legacy platform known as the Personnel Risk Management System (PRMS).

To address these deficiencies, the Department is actively pursuing a modern, web-based risk management and training system. The new system must support core functionalities such as case initiation, approval, review, archiving, and routing. Additional essential features include electronic forms (e-Forms), automated system alerts, reporting and tracking in compliance with Senate Bill 2, training tracking capabilities, and advanced business intelligence tools.

Furthermore, the system must enable automated, rank-specific notifications to relevant stations and units. Enhanced tracking functionality is also required to ensure accountability by recording the individuals responsible for completing, reviewing, and approving complaint records.

The implementation of the new risk management system may necessitate revisions to the SCR Handbook, including potential updates to existing timeline requirements, to align policy with the enhanced system capabilities.

CONCLUSION

The Audit Recommendation Follow-Up Report highlighted the progress made in addressing the Comprehensive Review Report recommendations. Notable achievements include the implementation of several key recommendations, while others are actively being addressed. Despite some delays, clear plans are in place to initiate and complete the remaining recommendations.

Continuous monitoring and dedicated efforts from all Department management will be essential to ensure all recommendations are fully implemented, thereby enhancing overall compliance with the Agreement, risk management, and operational efficiency.

The AAB will continue to conduct Public Complaints Audits in 2025 to uphold transparency and accountability, assess progress, and provide recommendations for ongoing improvement at the AV Stations. These efforts are crucial in assisting the AV Stations in meeting the goals of adhering to the Agreement and achieving the established compliance metrics. By systematically evaluating operational practices, the AAB is committed to fostering a culture of continuous improvement, ultimately enhancing the effectiveness and integrity of operations within the AV Stations.

Views of Responsible Officials

On May 27, 2025, the AAB submitted the Audit Recommendation Follow-Up Report to the Division Director, Office of Constitutional Policing.

05/27/25

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