

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

AUDIT AND ACCOUNTABILITY BUREAU



Use of Force Audit Comprehensive Review Report

De-escalation and Use of Force Assessment
Antelope Valley Stations
Project No. 2024-51-A



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EXECUTIVE SUMMARY

The County of Los Angeles, the Los Angeles County Sheriff's Department (LASD or Department), and the United States Department of Justice (DOJ) entered into the Antelope Valley (AV) Settlement Agreement (Agreement) on April 28, 2015¹, with the goal of ensuring police services are provided to the AV community in a manner that 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 a renewed public confidence in the LASD.

The Audit and Accountability Bureau (AAB) was authorized by the Sheriff of Los Angeles County, the DOJ, and the AV Monitoring Team (MT) to conduct audits of the Department's use of force investigations. These limited scope audits, referred to by the AAB as "mini" audits, focused on a narrow set of audit objectives and specific audit populations. For Part I of the Use of Force Audit, auditors examined de-escalation techniques and assessed the degree to which the Department was complying with use of force policies. Auditors also evaluated the provisions governing the reporting and investigation of reportable use of force events and provided Lancaster Station and Palmdale Station (AV Stations) with timely feedback, allowing for necessary operational improvements.

In addition, the AAB auditors simultaneously conducted additional Use of Force audits assessing other key paragraphs (as represented below) of the Agreement. This comprehensive approach ensured the AAB reviewed each required paragraph of the Agreement leading to a thorough evaluation of operational effectiveness and accountability. The Use of Force audits were conducted in the following manner:

Part	Objectives
Part I	De-escalation and Use of Force Assessment
Part III	Use of Force Training and Oversight of Public Recordings

Comprehensive Review Report

The Comprehensive Review Report (review) is a compilation of audit findings resulting from three separate audits for Part I: De-escalation and Use of Force Assessment (2024-5-A, 2024-18-A, and 2024-31-A). The primary audit objectives were to assess the use of de-escalation techniques, the reasonableness of the force used, and identify deficiencies in management's oversight of the investigative process.

¹ [Antelope Valley Settlement Agreement, No. CV 15-03174, United States v. Los Angeles County et al. \(D.C. Cal. April 28, 2015\)](#)

USE OF FORCE AUDIT
DE-ESCALATION AND USE OF FORCE ASSESSMENT
ANTELOPE VALLEY STATIONS
PROJECT NO. 2024-51-A

Each individual audit report presented detailed findings which were conveyed to the AV Stations. These reports highlighted specific areas of concern and offered audit recommendations to address the issues identified during the auditing process. The AV Station Captains and North Patrol Division were provided an opportunity to respond to the audit reports through an informal e-mail. In the first Use of Force audit (2024-5-A), the AV Stations concurred with the audit findings. In the second audit (2024-18-A), Palmdale Station concurred with the audit findings, while Lancaster Station did not concur with all of the findings. In the third audit (2024-31-A), Palmdale Station did not concur with all details of the audit findings, while Lancaster Station did not respond to the AAB.

The following table lists the project number and audit period of each audit:

Project No.	Audit Period
2024-5-A	October 1, 2023, through December 31, 2023
2024-18-A	January 1, 2024, through March 31, 2024
2024-31-A	April 1, 2024, through June 30, 2024

The following is a summary of the cumulative findings. The auditors assessed the AV Stations individually for each objective and combined the results to evaluate the overall population.

Summary of Cumulative Findings

Objective No.	Audit Objectives	2024-5-A	2024-18-A	2024-31-A	Cumulative Total	Compliance Metrics %
1	DE-ESCALATION ASSESSMENT					
1(a)	<i>Using Advisements, Warnings, Verbal Persuasion Before Force</i>	100%	100%	100%	100%	90%
1(b)	<i>De-Escalate as Control is Achieved</i>	100%	100%	100%	100%	90%
2	USE OF FORCE ASSESSMENT					
2(a)	<i>Force Used on Passive Resistive Subjects</i>	100%	100%	100%	100%	90%
2(b)	<i>Force Used on Subjects Displaying Resistive Behavior</i>	100%	100%	100%	100%	90%
2(c)	<i>Proportional Force</i>	100%	100%	90%	97%	90%
2(d)	<i>Retaliatory Force</i>	100%	100%	100%	100%	90%
2(e)	<i>Force Used on Persons Recording Police Activities</i>	N/A	100%	100%	100%	90%
2(f)	<i>Head Strike Procedures</i>	N/A	N/A	N/A	N/A	90%
3	MANAGEMENT OVERSIGHT OF USE OF FORCE					
3(a)	<i>Management Oversight of Critical Deficiencies</i>	NCI	100%	100%	100%	90%
		CAT1	100%	50%	100%	83%
		CAT2	100%	100%	100%	93%
3(b)	<i>Management Oversight of Non-Critical Deficiencies</i>	NCI	75%	100%	100%	90%
		CAT1	100%	40%	80%	69%
		CAT2	100%	100%	67%	86%

Findings Limitations

Auditors selected an audit period for the three audits in which the most recent completed investigations could be evaluated. Audit findings were limited to the completed use of force cases evaluated and results may not be projected on to the overall population.

The auditors also noted patterns, trends, and observations within the detailed audit findings of the review which highlighted recurring challenges and areas where the AV Stations could improve their operations. This review yielded two recommendations in areas where compliance has not yet been fully achieved. The audit recommendations are critical to ensuring the AV Stations align with Department standards and the expectations of the Agreement.

A detailed discussion of these recommendations can be found toward the end of the review, where the auditors provide further insights into the recommended corrective actions to address deficiencies, hold deputies and supervisors accountable, and improve overall compliance. Auditors also noted areas where the AV Stations met the established compliance metrics during the audit time periods. Specifically:

- Using or attempting to use de-escalation techniques, when feasible, prior to and during the use of force
- Using force consistent with Department policy

Additionally, auditors observed improvements in the following areas:

- Management oversight and review of UOF investigations

The AAB will continue to conduct detailed audits to uphold transparency and accountability, assess progress and provide recommendations for ongoing improvement at the AV Stations.

Follow-up Procedures

Within 60 days of distributing this review to the involved Department executives and Bureaus, the AAB will conduct a follow-up inspection. This inspection will assess whether the AV Stations have responded to the audit recommendations and implemented the necessary operational improvements. As part of the follow-up, the AAB will request proof of corrective action to verify whether the recommendations have been adequately addressed and if the AV Stations are making concerted efforts to meet the compliance metrics.

The AAB acknowledges the dedication and hard work of the AV Station Unit Commanders and their personnel. We are committed to providing ongoing guidance throughout the audit process to ensure compliance is not only achieved but also sustained over time. The AAB believes in its mission to provide independent, objective, and thorough analyses to assess and improve the Department's policies, procedures, and practices. Through these efforts, the AAB helps ensure transparency and accountability to the Department's operations and management.

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

**Use of Force Audit
Part I: De-Escalation and Use of Force Assessment
Antelope Valley Stations
Project No. 2024-51-A**

COMPREHENSIVE REVIEW REPORT

PURPOSE

The Audit and Accountability Bureau (AAB) was authorized by the Los Angeles County Sheriff's Department (LASD or the Department), the United States Department of Justice (DOJ), and the Antelope Valley Monitoring Team (MT) to conduct audits of the Department's use of force investigations. This Comprehensive Review Report (review) consolidates the audit findings of three separate audits referred to as Part I of the Use of Force: De-escalation and Use of Force Assessment.

As mandated by the Antelope Valley (AV) Settlement Agreement² (Agreement), the primary audit objectives were to assess the use of de-escalation techniques, the reasonableness of the force used, and identify deficiencies in management's oversight of the investigative process.

The results from each audit report evaluated Lancaster and Palmdale Stations (AV Stations) adherence to the Agreement's provisions and other Department protocols. The AAB's audit findings and recommendations provided the MT with essential data to determine whether the Department is meeting its obligations under Paragraph 149 of the Agreement which states:

The Monitor shall... determine whether LASD has implemented and continues to comply with the material requirements of this Agreement... Where appropriate, the monitor will make use of audits conducted by the [Audit and Accountability Bureau] taking into account the importance of internal auditing capacity and independent assessment of this agreement.

Auditors independently conducted the audit test work to ensure the audit process, and its outcomes were accurate, thorough, and in line with auditing standards. Key emphasis was placed on comprehensive strategies in audit planning, gathering necessary data and establishing audit populations for the audit test work.

² [Antelope Valley Settlement Agreement, No. CV 15-03174, United States v. Los Angeles County et al. \(D.C. Cal. April 28, 2015\)](#)

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 a renewed public confidence in the LASD.

The AAB shifted its audit approach from conducting full-scale audits, opting to conduct each subject as limited scope audits, referred to as “mini” audits. These audits focused on a narrow set of objectives and small audit populations. The goal of conducting the audits was to provide timely feedback to the AV Stations, facilitate opportunities for operational improvements and demonstrate an increasing commitment toward compliance. However, due to the limited sample sizes, these reports are not representative of the entirety of use of force cases and are not indicative of compliance to the established metrics.

The Use of Force audits were conducted in the following manner:

Part	Objectives
Part I	De-escalation and Use of Force Assessment
Part III	Use of Force Training and Oversight of Public Recordings

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

The information in this review derives from the audit findings from each project listed below:

Audits Included in this Comprehensive Review Report

Audit	Project No.
Part I: Use of Force Audits	2024-5-A
	2024-18-A
	2024-31-A

OBJECTIVES, SCOPE, AND METHODOLOGY

Audit Scope and Criteria

The AAB carefully designed the audit objectives, scope and methodology with a focus on the Agreement. Audit work plans were developed and previously submitted to the Subject Matter Experts (SME), MT, and DOJ for approval. This collaborative approach ensured the audits aligned with the Agreement and promoted transparency and thoroughness in the review process.

Audit objectives and methodologies were adjusted based on input from the SME. This involved ongoing discussions with a focus of conducting mini audits to provide the AV stations with prompt feedback, not necessarily with the intent to indicate compliance with the established metrics. Several subjects such as audit objectives, procedures, audit testing, population sampling selection, and audit findings interpretations were also discussed. In addition, changes to the audit methodologies were adjusted, when applicable, to ensure the appropriate audit test work was performed and the audit documentation was gathered and analyzed.

Under the Department's policy, uses of force fall into four categories:

Non-Categorized Force Incident (NCI) involves any of the following where there is no injury or complaint of pain from the suspect, and no allegation of unreasonable force or other misconduct:

- Resisted Hobble application;
- Resisted searching and handcuffing techniques; and/or
- Resisted firm grip, control holds, come-along, or control techniques.

For compliance purposes, auditors used the same metrics for NCIs as Category 1 cases³.

Category 1 Force (CAT 1) involves any of the following where there is no injury:

- Take downs; and/or
- Use of Oleoresin Capsicum spray, Freeze +P or Deep Freeze aerosols, or Oleoresin Capsicum powder from a pepper-ball projectile (when a suspect is not struck by a pepper-ball projectile) if it causes only discomfort and does not involve injury or lasting pain.

Category 2 Force (CAT 2) involves any of the following:

- Any identifiable injury;
- A complaint of pain that a medical evaluation determines is attributable to an identifiable injury; and/or
- Any application of force other than those defined in Category 1 Force does not rise to the level of Category 3 Force.

³ Antelope Valley Monitoring Team, 4th Use-of-Force Audit, November 15, 2023, page 9.

Category 3 Force (CAT 3) involves any of the following:

- All shootings in which a shot was intentionally fired at a person by a Department member;
- Any type of shooting by a Department member which results in a person being hit;
- Force resulting in admittance to a hospital;
- Any death following a use of force by any Department member;
- All intentional head or neck strikes with an impact weapon;
- Kicks or knee strikes intentionally delivered to a person's head or neck;
- Intentionally striking a person's head against a hard, fixed object;
- Skeletal fractures caused by any Department member, with the exception of minor fractures of the nose, fingers or toes;
- Any use of Improvised Weapons and/or Techniques;
- All canine bites; or
- Any force which results in a response from the Internal Affairs Bureau (IAB) Force/Shooting Response Team, as defined in Manual of Policy and Procedures (MPP) Section 3-10/130.00, Activation of the IAB Force/Shooting Response Teams (July 19, 2024).

Audit Population and Sampling

The AAB specifically designed the audits to evaluate small audit populations to ensure auditors could provide impactful results to the auditee in a short turnaround time.

Judgmental sampling was utilized for the selection of the audit population. Auditors selected this method to obtain a population consisting of the most recently completed UOF investigations from both AV Stations. The NCIs were considered complete once approved by the Unit Commander⁴. Both CAT 1 and CAT 2 investigations were considered complete once approved by the North Patrol Division (NPD). The AAB did not evaluate CAT 3 investigations in this audit.

Thirty UOF investigations were analyzed, with an equal distribution of fifteen from each AV Station. During each audit, auditors selected a maximum of two NCIs from each AV Station and the remaining UOF investigations selected were a combination of CAT 1 and CAT 2.

Auditors selected an audit period for the three audits in which the most recent, completed investigations could be evaluated. The audit population documents were obtained from the AV Stations' internal tracking systems and the Risk Management Bureau's Discovery Unit via the Performance Recording and Monitoring System (PRMS)⁵. The audit period for each audit in this review are indicated below.

⁴ The Department's Supervisor's Non-Categorized Incident User's Guide for Patrol specifies that NCIs are complete upon approval by the Unit Commander.

⁵ The PRMS provides a systematic recording of data relevant to incidents involving uses of force, shootings, administrative investigations, and commendations/complaints involving Department personnel.

Project Number and Audit Period

Project No.	Audit Period
2024-5-A	October 1, 2023, through December 31, 2023
2024-18-A	January 1, 2024, through March 31, 2024
2024-31-A	April 1, 2024, through June 30, 2024

Auditors assessed the AV Stations individually for each objective and combined the results to evaluate the overall population. Detailed below is a summary of the cumulative findings.

Summary of Cumulative Findings

Objective No.	Audit Objectives	2024-5-A	2024-18-A	2024-31-A	Cumulative Total	Compliance Metrics % ⁶
1	DE-ESCALATION ASSESSMENT					
1(a)	<i>Using Advisements, Warnings, Verbal Persuasion Before Force</i>	100%	100%	100%	100%	90%
1(b)	<i>De-Escalate as Control is Achieved</i>	100%	100%	100%	100%	90%
2	USE OF FORCE ASSESSMENT					
2(a)	<i>Force Used on Passive Resistive Subjects</i>	100%	100%	100%	100%	90%
2(b)	<i>Force Used on Subjects Displaying Resistive Behavior</i>	100%	100%	100%	100%	90%
2(c)	<i>Proportional Force</i>	100%	100%	90%	97%	90%
2(d)	<i>Retaliatory Force</i>	100%	100%	100%	100%	90%
2(e)	<i>Force Used on Persons Recording Police Activities</i>	N/A	100%	100%	100%	90%
2(f)	<i>Head Strike Procedures</i>	N/A	N/A	N/A	N/A	90%
3	MANAGEMENT OVERSIGHT OF USE OF FORCE					
3(a)	<i>Management Oversight of Critical Deficiencies</i>	NCI	100%	100%	100%	90%
		CAT1	100%	50%	100%	83%
		CAT2	100%	100%	100%	93%
3(b)	<i>Management Oversight of Non-Critical Deficiencies</i>	NCI	75%	100%	100%	90%
		CAT1	100%	40%	80%	69%
		CAT2	100%	100%	67%	86%

⁶ Those compliance metrics were based on agreed upon statistically valid and random audit samples which were not conducted in this engagement.

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Detailed Findings

Objective No. 1 – De-Escalation Assessment

This objective evaluated whether de-escalation techniques were attempted or used, when possible, prior to and during the use of force as specified in the AV Agreement compliance metrics.

Objective No. 1(a) – Using Advisements, Warnings, Verbal Persuasion

Criteria

Antelope Valley Settlement Agreement, Paragraph 103 (partial), states:

Deputies shall use advisements, warnings, and verbal persuasion, and/or other de-escalation tactics, when possible, before resorting to force...

Antelope Valley Settlement Agreement Compliance Metrics, USE OF FORCE, The Use of Force, Compliance Measures 3E (partial), (August 2019), states:

3. *The Department will be deemed in outcome compliance with these provisions when:*
 - E. *For Paragraph 103, deputies use advisements, warnings and verbal persuasion, and/or other de-escalation tactics, when possible, before resorting to force, and de-escalate the use of force immediately as resistance decreases in:*
 2. *At least 90% of the Category 2 use-of-force incidents; and,*
 3. *At least 90% of the Category 1 use-of-force incidents.*

Procedures

The auditors evaluated a total of thirty UOF investigation packages as well as related audio/video files (i.e., Body-Worn Camera (BWC) recordings, audio recordings, and images) obtained from LASD.Evidence.com, for each force incident to determine whether Department personnel used de-escalation techniques, when possible, prior to resorting to force.

Summary of Findings

The auditors noted the following while determining whether deputies attempted or utilized de-escalation techniques, when possible, prior to and during use of force:

Project No. 2024-5-A

Of the ten investigations reviewed:

- All (100%) met the criteria for this objective. Department personnel adequately attempted to de-escalate the incident using verbal communication (advisements, warnings, and verbal persuasion), use of time-and-distance or other common-sense methods before resorting to force.

Project No. 2024-18-A

Of the ten investigations reviewed:

- All (100%) met the criteria for this objective. Department personnel adequately attempted to de-escalate the incident using verbal communication (advisements, warnings, and verbal persuasion), use of time-and-distance or other common-sense methods before resorting to force.

Project No. 2024-31-A

Of the ten investigations reviewed:

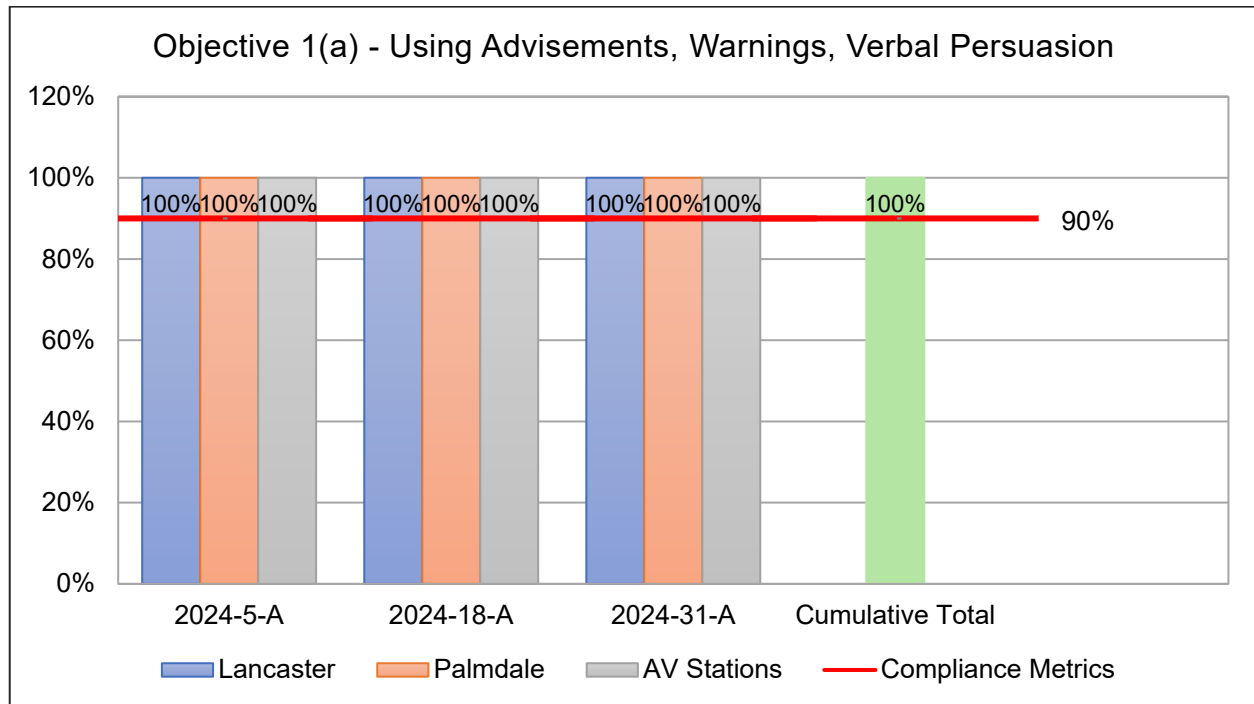
- All (100%) met the criteria for this objective. Department personnel adequately attempted to de-escalate the incident using verbal communication (advisements, warnings, and verbal persuasion), use of time-and-distance or other common-sense methods before resorting to force.

Cumulative Total

Of the 30 investigations reviewed:

- All (100%) investigations met the criteria for this objective. Department personnel adequately attempted to de-escalate the incident using verbal communication (advisements, warnings, and verbal persuasion), use of time-and-distance or other common-sense methods before resorting to force.

Summary of Cumulative Total for Objective 1(a) – Using Advisements, Warnings, Verbal Persuasion



Noted Patterns, Trends, and Observations

As detailed in the chart above, the AV Stations met the established compliance metrics of 90% during the three audits previously conducted and cumulatively. The AV Stations used de-escalation techniques, when possible, prior to resorting to force.

Recommendations

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

Objective No. 1(b) – De-Escalate as Control is Achieved

Criteria

Antelope Valley Settlement Agreement, Paragraph 103 (partial), states:

Deputies shall... de-escalate force immediately as resistance decreases.

Antelope Valley Settlement Agreement Compliance Metrics, USE OF FORCE, The Use of Force, Compliance Measures 3E (partial), (August 2019), states:

3. *The Department will be deemed in outcome compliance with these provisions when:*

E. For Paragraph 103, deputies use advisements, warnings and verbal persuasion, and/or other de-escalation tactics, when possible, before resorting to force, and de-escalate the use of force immediately as resistance decreases in:

- 2. At least 90% of the Category 2 use-of-force incidents; and,*
- 3. At least 90% of the Category 1 use-of-force incidents.*

Procedures

The auditors evaluated a total of thirty UOF investigation packages, including BWC recordings, for each use of force incident. Auditors assessed whether the deputies de-escalated the force used as control of the subject was achieved.

Summary of Findings

The auditors noted the following while determining whether deputies attempted or utilized de-escalation techniques, when possible, prior to and during use of force:

Project No. 2024-5-A

Of the ten investigations reviewed:

- All (100%) met the criteria for this objective. Department personnel decreased the level of force used once control was achieved and it was reasonably safe and feasible to do so.

Project No. 2024-18-A

Of the ten investigations reviewed:

- All (100%) met the criteria for this objective. Department personnel decreased the level of force used once control was achieved and it was reasonably safe and feasible to do so.

Project No. 2024-31-A

Of the ten investigations reviewed:

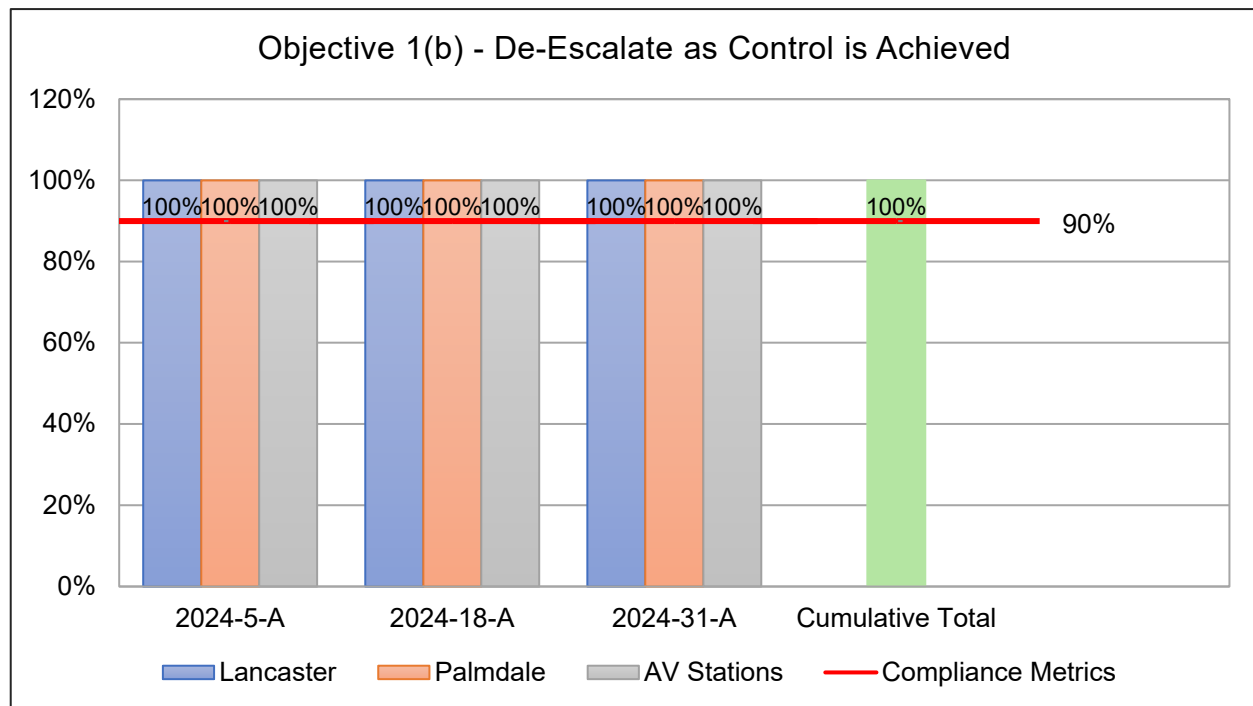
- All (100%) met the criteria for this objective. Department personnel decreased the level of force used once control was achieved and it was reasonably safe and feasible to do so.

Cumulative Total

Of the 30 investigations reviewed:

- All (100%) met the criteria for this objective. Department personnel decreased the level of force used once control was achieved and it was reasonably safe and feasible to do so.

Summary of Cumulative Total for Objective 1(b) – De-Escalate as Control is Achieved



Noted Patterns, Trends, and Observations

As detailed in the chart above, the AV Stations met the established compliance metrics of 90% during the three audits previously conducted and cumulatively. The AV Stations decreased the level of force used once control was achieved and it was reasonably safe and feasible to do so.

Recommendations

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

Objective No. 2 – Use of Force Assessment

This objective evaluated whether the force used by deputies was consistent with Department policy as specified in the AV Agreement compliance metrics.

Objective No. 2(a) – Force Used on Passive Resistive Subjects

Criteria

Antelope Valley Settlement Agreement, Paragraph 102, states:

LASD agrees to continue to prohibit the use of force above unresisted handcuffing to overcome passive resistance, except where physical removal is permitted as necessary and objectively reasonable.

Antelope Valley Settlement Agreement Compliance Metrics, USE OF FORCE, The Use of Force, Compliance Measures, 3B and 3C, (August 2019), states:

3. *The Department will be deemed in outcome compliance with these provisions when:*
 - B. *At least 90% of the Category 2 use-of-force incidents are assessed as objectively reasonable according to ¶102, 104, 105, 106g and 107;*
 - C. *At least 90% of the Category 1 use-of-force incidents are assessed as objectively reasonable according to ¶102, 104, 105, 106g and 107;*

Procedures

The auditors evaluated a total of thirty UOF investigation packages, including BWC recordings, to determine whether force was used on a passive resistive subject.

Summary of Findings

The auditors noted the following during their evaluation:

Project No. 2024-5-A

Of the ten investigations reviewed:

- Three did not result in any findings because the criteria were not applicable to the investigations. The investigations reviewed did not involve passive resistant subjects.

- The seven (100%) remaining investigations met the criteria for this objective because Department personnel did not use force above unresisted handcuffing to overcome passive resistant subjects.

Project No. 2024-18-A

Of the ten investigations reviewed:

- Nine did not result in any findings because the criteria were not applicable to the investigations. The investigations reviewed did not involve passive resistant subjects.
- The one (100%) remaining investigation met the criteria because deputies used necessary force to arrest the individual and physically place them in the patrol vehicle for transport, which is permitted per Department policy.

Project No. 2024-31-A

Of the ten investigations reviewed:

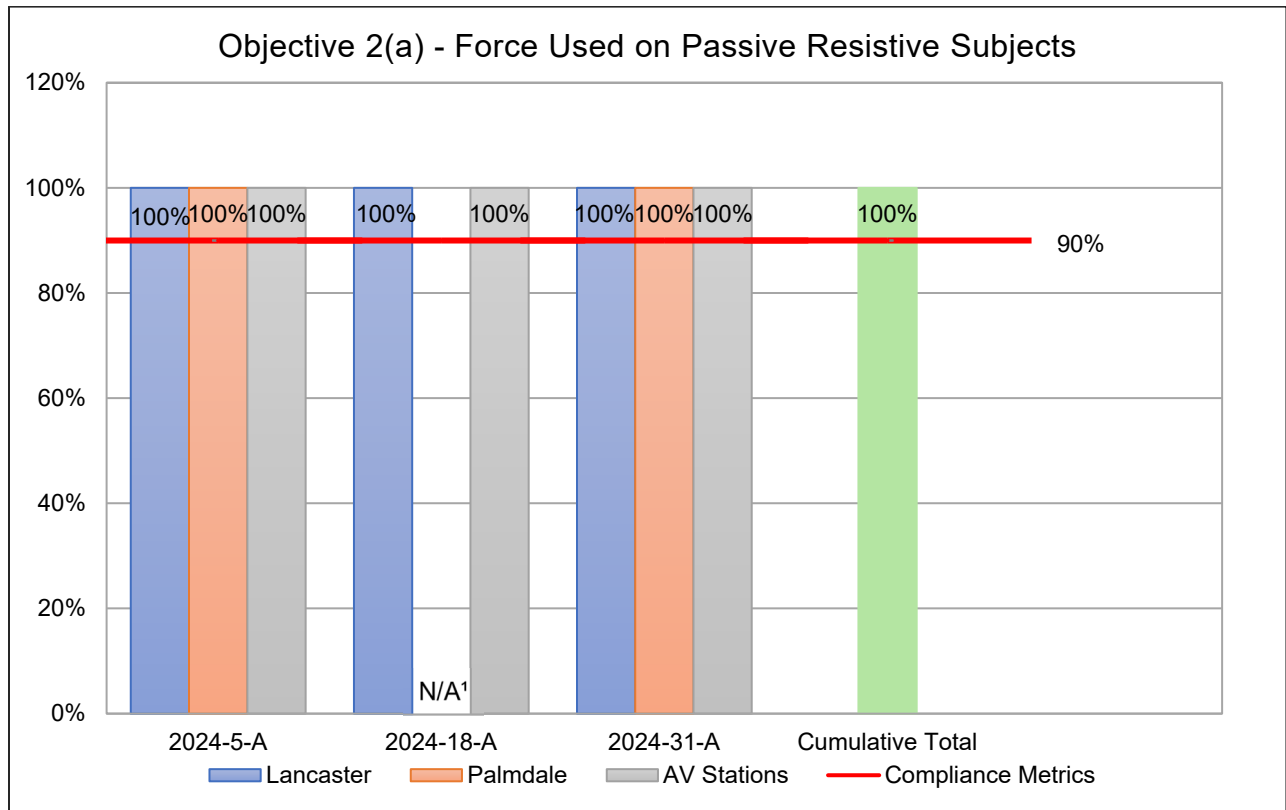
- Six did not result in any findings because the criteria were not applicable to the investigations. The investigations reviewed did not involve passive resistant subjects.
- The four (100%) remaining investigations met the criteria because deputies used necessary force to arrest the individual and physically place them in the patrol vehicle for transport, which is permitted per Department policy.

Cumulative Total

Of the 30 UOF investigations reviewed:

- Eighteen did not result in any findings because the criteria were not applicable to the investigations. The investigations reviewed did not involve passive resistant subjects.
- The 12 (100%) remaining investigations met the criteria because deputies used necessary force to arrest the individual and physically place them in the patrol vehicle for transport, which is permitted per Department policy.

Summary of Cumulative Total for Objective 2(a) – Force Used on Passive Resistive Subjects



¹N/A indicates there were no UOF investigations to assess because the criteria were not applicable to the investigations

Noted Patterns, Trends, and Observations

As detailed in the chart above, the AV Stations met the established compliance metrics of 90% during the three audits previously conducted and cumulatively. The AV Stations did not use force on a passive resistive subject.

Recommendations

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

Objective No. 2(b) – Force Used on Subjects Displaying Resistive Behavior

Criteria

Antelope Valley Settlement, Paragraph 104.1, states:

LASD agrees to clarify that Antelope Valley deputies may not use force against individuals who may be exhibiting resistive behavior, but who are under control and do not pose a threat to the public safety, themselves, or to other deputies.

Antelope Valley Settlement Agreement Compliance Metrics, USE OF FORCE, The Use of Force, Compliance Measures, 3B and 3C, (August 2019), states:

3. *The Department will be deemed in outcome compliance with these provisions when:*
 - B. *At least 90% of the Category 2 use-of-force incidents are assessed as objectively reasonable according to ¶102, 104, 105, 106g and 107;*
 - C. *At least 90% of the Category 1 use-of-force incidents are assessed as objectively reasonable according to ¶102, 104, 105, 106g and 107;*

Procedures

Auditors evaluated a total of 30 UOF investigation packages, including BWC recordings, to determine whether force was used on a subject who was exhibiting resistive behavior but was under control and did not pose a threat to the public safety, themselves, or deputies.

Summary of Findings

The auditors noted the following during their evaluation:

Project No. 2024-5-A

Of the ten investigations reviewed:

- All (100%) met the criteria for this objective because Department personnel did not use force against individuals exhibiting resistive behavior who were under control and not posing a threat to public safety, themselves, or deputies.

Project No. 2024-18-A

Of the ten investigations reviewed:

- All (100%) met the criteria for this objective. Department personnel did not use force against individuals exhibiting resistive behavior who were under control and not posing a threat to public safety, themselves, or deputies.

Project No. 2024-31-A

Of the ten investigations reviewed:

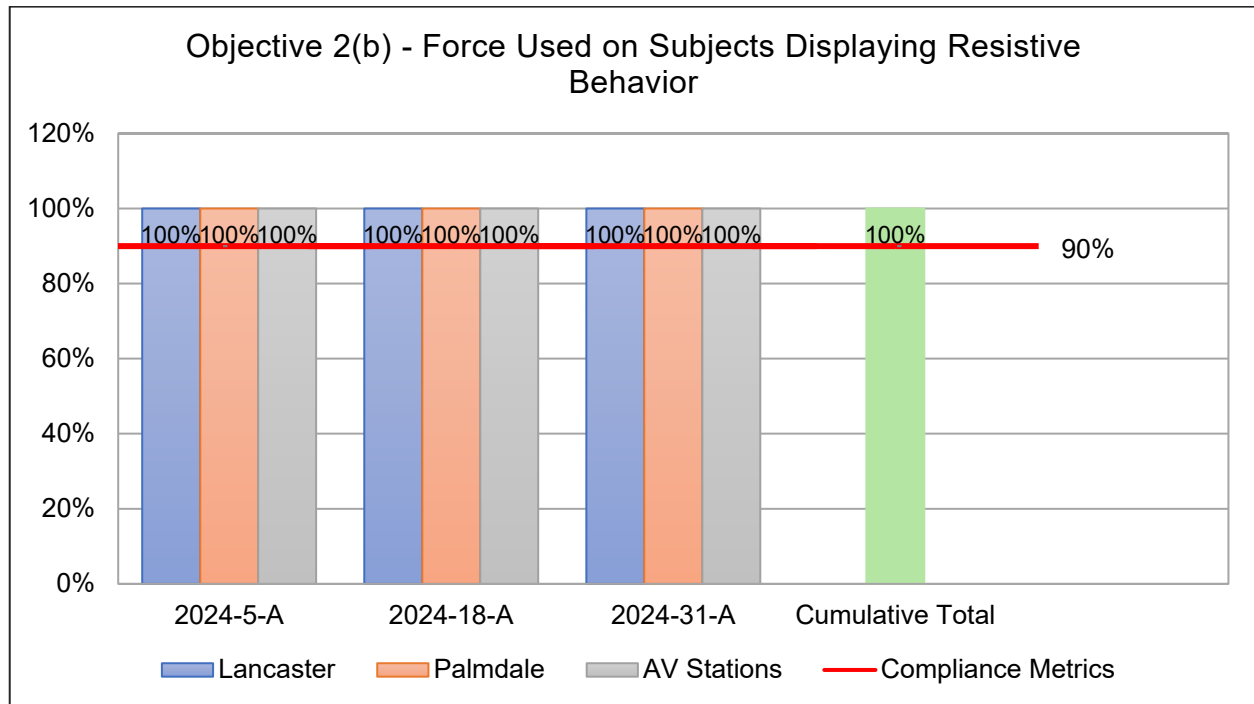
- All (100%) met the criteria for this objective. Department personnel did not use force against individuals exhibiting resistive behavior who were under control and not posing a threat to public safety, themselves, or deputies.

Cumulative Total

Of the 30 UOF investigations reviewed:

- All (100%) met the criteria for this objective. Department personnel did not use force against individuals exhibiting resistive behavior who were under control and not posing a threat to public safety, themselves, or deputies.

**Summary of Cumulative Total for Objective 2(b) – Force Used on Subjects
Displaying Resistive Behavior**



Noted Patterns, Trends, and Observations

As detailed in the chart above, the AV Stations met the established compliance metrics of 90% during the three audits previously conducted and cumulatively. The AV Stations did not use force on a subject displaying resistive behavior but was under control and did not pose a threat to the public safety, themselves, or to other deputies.

Recommendations

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

Objective No. 2(c) – Proportional Force

Criteria

Antelope Valley Settlement Agreement, Paragraph 104.2, states:

LASD agrees to continue to require that Antelope Valley deputies assess the threat of an individual prior to using force and emphasize that a use of force must be proportional⁷ to the threat or resistance of the subject. If a threat or resistance no longer exists, deputies cannot justify the use of force against a subject.

Antelope Valley Settlement Agreement Compliance Metrics, USE OF FORCE, The Use of Force, Compliance Measures, 3B and 3C, (August 2019), states:

3. *The Department will be deemed in outcome compliance with these provisions when:*
 - B. *At least 90% of the Category 2 use-of-force incidents are assessed as objectively reasonable according to ¶102, 104, 105, 106g and 107;*
 - C. *At least 90% of the Category 1 use-of-force incidents are assessed as objectively reasonable according to ¶102, 104, 105, 106g and 107;*

Procedures

Auditors evaluated a total of 30 UOF investigation packages, including BWC recordings, for each force incident to determine whether Department personnel used force proportional to the threat or resistance posed by the subject, as defined by the parties⁷, and discontinued force when the threat or resistance no longer existed.

Summary of Findings

The auditors noted the following during their evaluation:

Project No. 2024-5-A

Of the ten investigations reviewed:

- All (100%) met the criteria for this objective because Department personnel used only the amount of force which was proportional and reasonably necessary to perform their duties.

⁷ The parties (The "Parties" is comprised of LASD, AV Agreement Monitoring Team, and USDOJ.) have agreed that proportional force does not require that deputies use the same type or amount of force as the subject. The more immediate the threat and more likely it may result in death or serious physical injury, the greater the level of force that may be objectively reasonable and necessary to counter it.

Project No. 2024-18-A

Of the ten investigations reviewed:

- All (100%) met the criteria for this objective because Department personnel used only the amount of force, which was proportional, and reasonably necessary to perform their duties.

Project No. 2024-31-A

Of the ten investigations reviewed:

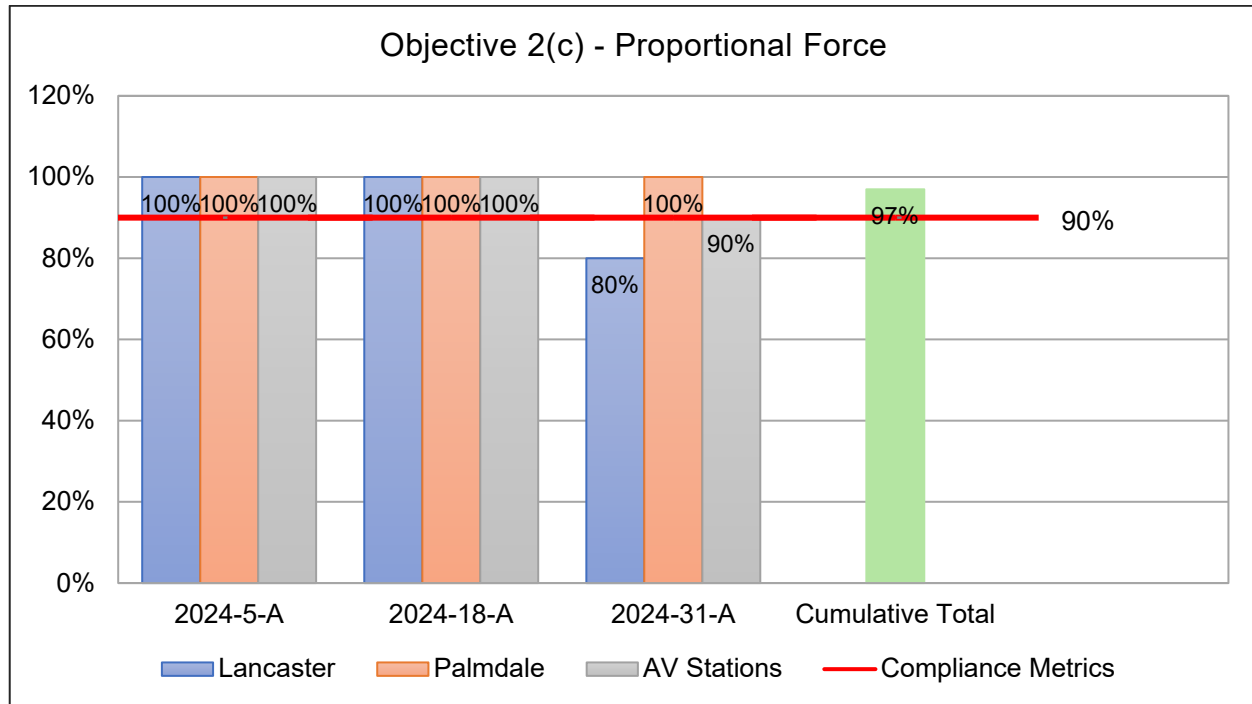
- Nine (90%) met the criteria for this objective because Department personnel used only the amount of force, which was proportional, and reasonably necessary to perform their duties.
- The one (10%) remaining investigation did not meet the criteria for this objective because Department personnel used force that was not reasonably necessary in relation to the subject's resistance. This was identified and adjudicated at the station level.

Cumulative Total

Of the 30 UOF investigations reviewed:

- Twenty-nine (97%) met the criteria for this objective because Department personnel used only the amount of force, which was proportional, and reasonably necessary to perform their duties.
- The one (3%) remaining investigation did not meet the criteria for this objective because Department personnel used force that was not reasonably necessary in relation to the subject's resistance.

Summary of Cumulative Total for Objective 2(c) – Proportional Force



Noted Patterns, Trends, and Observations

As detailed in the chart above, the AV Stations met the established compliance metrics of 90% during the three audits previously conducted and cumulatively. The AV Stations used force proportional to the threat or resistance of the subject, as defined by the parties, and discontinued force when threat or resistance no longer existed.

Recommendations

It is recommended Department personnel continue to assess the totality of the circumstances, including the conduct of the subject leading up to the use of force. This assessment will assist personnel in determining a balance between the threat posed, the seriousness of the suspected crime, and the amount of force used.

Department personnel should be reminded through monthly briefings that they are authorized to use only the amount of force consistent with Department policy to perform their duties. These briefings should be documented in the watch commander logs and/or an Automated Personnel In-Service (APIS) roster.

Objective No. 2(d) – Retaliatory Force

Criteria

Antelope Valley Settlement Agreement, Paragraph 105, states:

LASD agrees to explicitly prohibit the use of retaliatory force, particularly against subjects who express criticism of, or disrespect for, LASD Antelope Valley deputies.

Antelope Valley Settlement Agreement Compliance Metrics, USE OF FORCE, The Use of Force, Compliance Measures, 3B and 3C, (August 2019), states:

3. *The Department will be deemed in outcome compliance with these provisions when:*
 - B. *At least 90% of the Category 2 use-of-force incidents are assessed as objectively reasonable according to ¶¶102, 104, 105, 106g and 107;*
 - C. *At least 90% of the Category 1 use-of-force incidents are assessed as objectively reasonable according to ¶¶102, 104, 105, 106g and 107;*

Procedures

Auditors evaluated a total of 30 UOF investigation packages, including BWC recordings, for each force incident to determine whether Department personnel used retaliatory force against the subject. Auditors determined whether any retaliatory force was used or if force was used against a subject because of expressed criticism or disrespect for the deputies.

Summary of Findings

The auditors noted the following during their evaluation:

Project No. 2024-5-A

Of the ten investigations reviewed:

- There are no findings because the criteria was not applicable to the investigations reviewed in this objective.

Project No. 2024-18-A

Of the ten investigations reviewed:

- Six did not result in any findings because the criteria was not applicable to the investigations. The investigations reviewed did not involve subjects who expressed criticism or disrespect for LASD.
- The four (100%) remaining investigations met the criteria for this objective because Department personnel did not use force, in a retaliatory nature, against a subject who expressed criticism or disrespect for Department members.

Project No. 2024-31-A

Of the ten investigations reviewed:

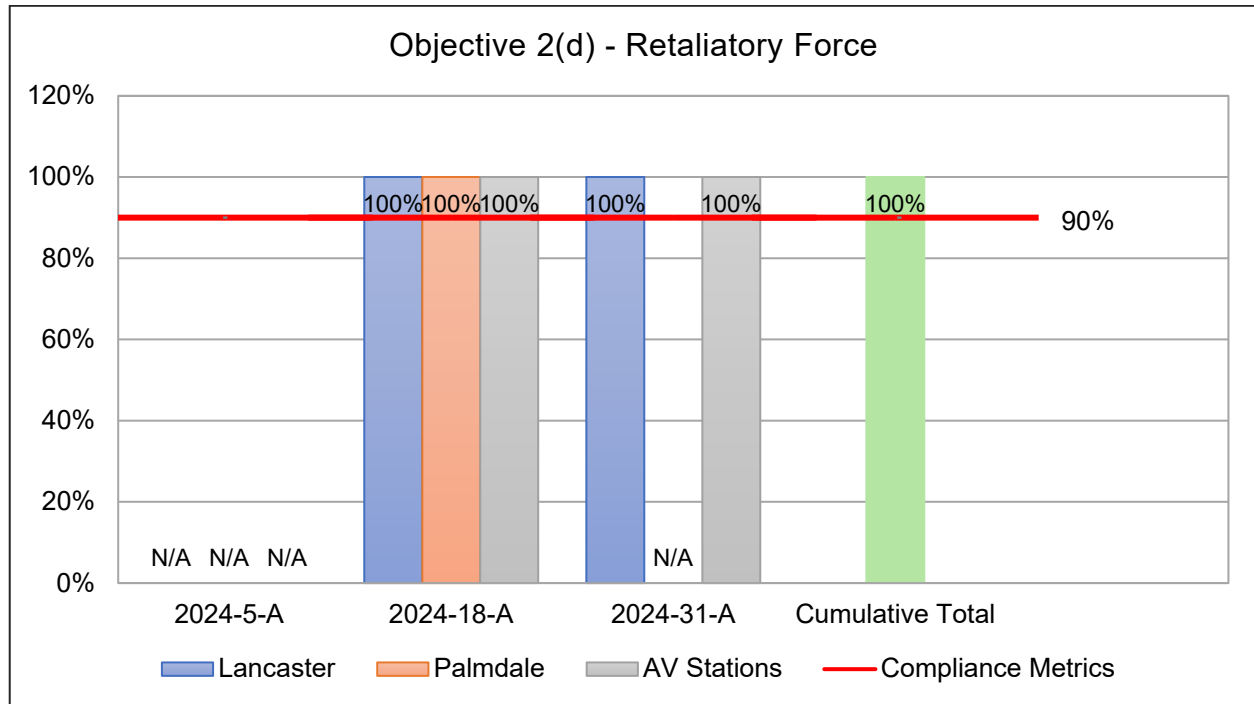
- Nine did not result in any findings because the criteria was not applicable to the investigations. The investigations reviewed did not involve subjects who expressed criticism or disrespect for LASD.
- The one (100%) remaining investigation met the criteria for this objective because Department personnel did not use force, in a retaliatory nature, against a subject who expressed criticism or disrespect for Department members.

Cumulative Total

Of the 30 UOF investigations reviewed:

- Twenty-five did not result in any findings because the criteria was not applicable to the investigations. The investigations reviewed did not involve individuals who expressed criticism or disrespect for LASD.
- The five (100%) remaining investigations met the criteria for this objective because Department personnel did not use force, in a retaliatory nature, against an individual who had expressed criticism or disrespect for Department members.

Summary of Cumulative Total for Objective 2(d) – Retaliatory Force



Noted Patterns, Trends, and Observations

As detailed in the chart above, the AV Stations met the established compliance metrics of 90% during the three audits and cumulatively. The auditors noted in the first audit (2024-5-A), the criteria did not apply to investigations reviewed in this objective. Additionally, the AV Stations did not use retaliatory force or force against a subject because of expressed criticism or disrespect for the deputies in the second (2024-18-A) and third (2025-31-A) audits.

Recommendations

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

Objective No. 2(e) – Force Used on Persons Recording Police Activities

Criteria

Antelope Valley Settlement Agreement, Paragraph 106g, states:

*LASD agrees to explicitly prohibit interfering, threatening, intimidating, blocking or otherwise discouraging a member of the public, who is not violating any other law, from taking photographs or recording video (including photographs or video of police activities) in any place the member of the public is lawfully present. Such prohibited interference includes... **g. Using force upon that person;** ...*

Antelope Valley Settlement Agreement Compliance Metrics, USE OF FORCE, The Use of Force, Compliance Measures, 3B and 3C, (August 2019), states:

3. *The Department will be deemed in outcome compliance with these provisions when:*
 - B. *At least **90%** of the Category 2 use-of-force incidents are assessed as objectively reasonable according to ¶102, 104, 105, 106g and 107;*
 - C. *At least **90%** of the Category 1 use-of-force incidents are assessed as objectively reasonable according to ¶102, 104, 105, 106g and 107;*

Procedures

Auditors evaluated a total of 30 UOF investigation packages, including BWC recordings, for each force incident to determine whether Department personnel used force against a member of the public who was not violating any law, solely to prevent them from taking photographs or recording video in any place the member of the public was lawfully present.

Summary of Findings

The auditors noted the following during their evaluation:

Project No. 2024-5-A

Of the ten investigations reviewed:

- There are no findings because the criteria was not applicable to the investigations reviewed in this objective.

Project No. 2024-18-A

Of the ten investigations reviewed:

- Nine did not result in any findings because the criteria was not applicable to the investigations. The investigations reviewed did not involve individuals recording police activities.
- The one (100%) remaining investigation met the criteria because deputies did not use force on individuals recording policing activities.

Project No. 2024-31-A

Of the ten investigations reviewed:

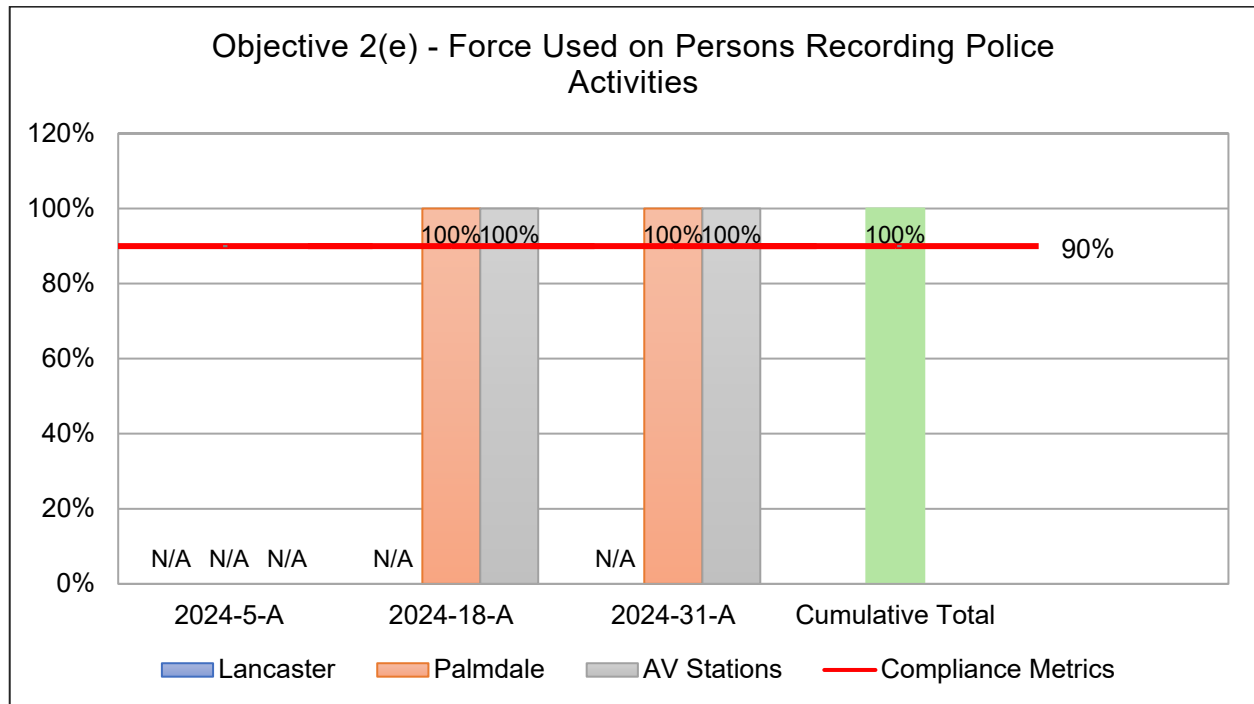
- Nine did not result in any findings because the criteria was not applicable to the investigations. The investigations reviewed did not involve individuals recording police activities.
- The one (100%) remaining investigation met the criteria because deputies did not use force on individuals recording policing activities.

Cumulative Total

Of the 30 UOF investigations reviewed:

- Twenty-eight did not result in any findings because the criteria was not applicable to the investigations. The investigations reviewed did not involve individuals recording police activities.
- The two (100%) remaining investigations met the criteria because deputies did not use force on individuals recording policing activities.

Summary of Cumulative Total for Objective 2(e) – Force Used on Persons Recording Police Activities



Noted Patterns, Trends, and Observations

As detailed in chart above, the AV Stations met the established compliance metrics of 90% during the three audits and cumulatively. The auditors noted in the first audit (2024-5-A), the criteria did not apply to investigations reviewed in this objective. Additionally, the AV Stations did not use force on persons recording police activities in the second (2024-18-A) and third (2025-31-A) audits.

Recommendations

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

Objective No. 2(f) – Head Strike Procedures

Criteria

Antelope Valley Settlement Agreement, Paragraph 107, states:

LASD will continue to require, and emphasize in its training, that a hard strike to the head with any impact weapon, including a baton, is prohibited unless deadly force is justified. Unintentional or mistaken blows to these areas must be reported to ensure that all reasonable care was taken to avoid them.

Antelope Valley Settlement Agreement Compliance Metrics, USE OF FORCE, The Use of Force, Compliance Measures, 3B and 3C, (August 2019), states:

3. *The Department will be deemed in outcome compliance with these provisions when:*
 - B. *At least 90% of the Category 2 use-of-force incidents are assessed as objectively reasonable according to ¶102, 104, 105, 106g and 107;*
 - C. *At least 90% of the Category 1 use-of-force incidents are assessed as objectively reasonable according to ¶102, 104, 105, 106g and 107;*

Procedures

Auditors evaluated a total of 30 UOF investigation packages, including BWC recordings, for each incident, to identify any misclassified investigations that contained a hard strike to the head with any impact weapon. If any misclassified investigations were identified, auditors documented it as a finding, recommended corrective action, and referred it to IAB for appropriate investigation.

Summary of Findings

The auditors noted the following during their evaluation:

Project No. 2024-5-A

Of the ten investigations reviewed:

- There are no findings because the criteria was not applicable to the investigations reviewed in this objective.

Project No. 2024-18-A

Of the ten investigations reviewed:

- There are no findings because the criteria was not applicable to the investigations reviewed in this objective.

Project No. 2024-31-A

Of the ten investigations reviewed:

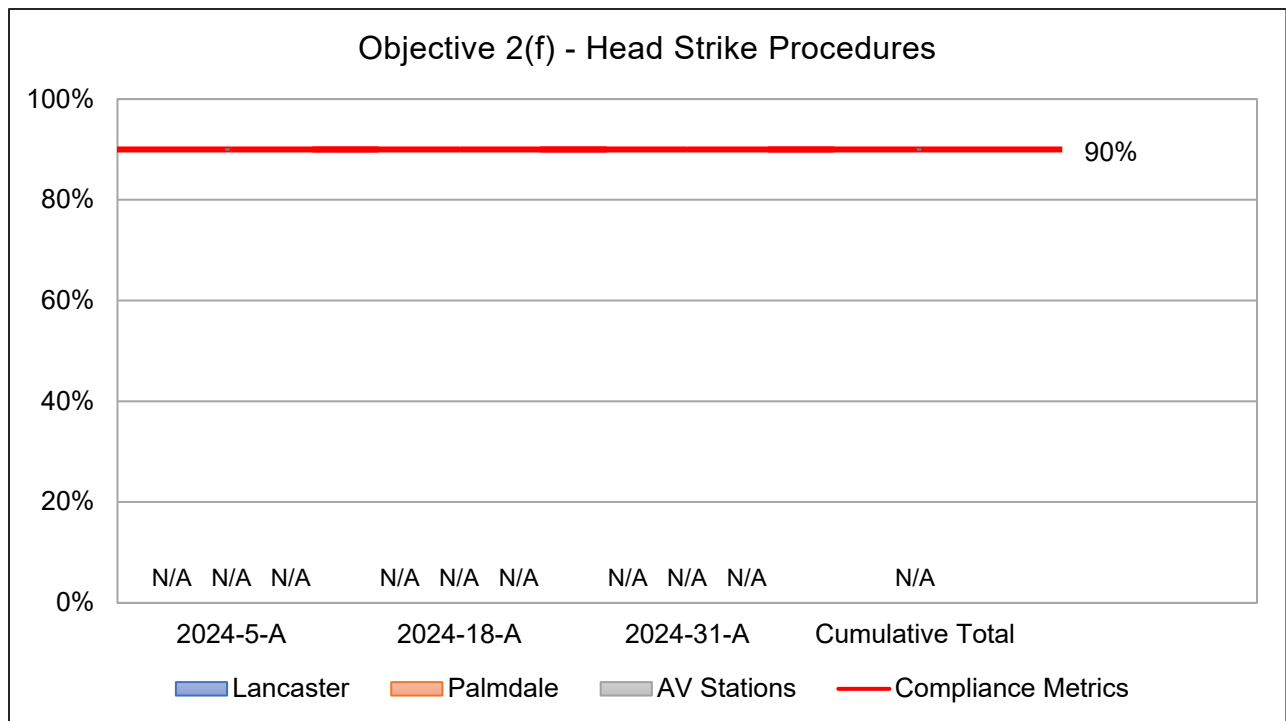
- There are no findings because the criteria was not applicable to the investigations reviewed in this objective.

Cumulative Total

Of the 30 UOF investigations reviewed:

- There are no findings because the criteria was not applicable to the investigations reviewed in this objective.

Summary of Cumulative Total for Objective 2(f) – Head Strike Procedures



Noted Patterns, Trends, and Observations

As detailed in the chart above, this objective was not applicable because the auditors did not identify any misclassified investigations that contained a hard strike to the head with any impact weapon

Recommendations

There are no recommendations because the criteria was not applicable to the investigations reviewed for this audit.

Objective No. 3 – Management Oversight of Use of Force

This objective evaluated if management oversight and review of UOF investigations addressed the requirements of the AV Agreement compliance metrics and Department policy.

Objective No. 3(a) – Management Oversight of Critical Deficiencies

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, USE OF FORCE, Management Oversight, Paragraphs 113-118 (August 2019), Compliance Measures, 1A (partial) states:

1. *The Monitor will use the following criteria to evaluate use-of-force adjudications for completeness and compliance with the SA requirements:*
 - A. ***Critical Deficiency...failure to hold supervisors accountable for not detecting, adequately investigating, or responding to force that is unreasonable or against LASD policy; ...***

Antelope Valley Settlement Agreement Compliance Metrics, USE OF FORCE, Management Oversight, Paragraphs 113-118 (August 2019), Compliance Measures, 4A and 4C states:

4. *LASD will be deemed in substantial outcomes compliance when:*
 - A. *At least **90%** of the Category 1 adjudications do not contain a Critical Deficiency.*
 - C. *At least **93%** of the Category 2 adjudications do not contain a Critical Deficiency.*

Procedures

The auditors evaluated a total of thirty UOF investigation packages, including BWC recordings, for each force incident to determine whether management reviewing the investigation held supervisors accountable for adequately investigating the feasibility, use of de-escalation techniques, and unreasonable UOF. Auditors determined if critical deficiencies were found in the UOF investigations conducted by Department supervisors.

Summary of Findings

The auditors noted the following during their evaluation:

Project No. 2024-5-A

The ten UOF investigations reviewed consisted of the following: four NCIs, three CAT1s, and three CAT2s.

Non-Categorized Force Incident

- Of the four investigations reviewed, all (100%) met the criteria for this objective because Department management ensured there were no deficiencies within the investigation. Specifically, the de-escalation efforts used when appropriate and possible and the reasonableness of the force.

Category 1 Force

- Of the three investigations reviewed, all (100%) met the criteria for this objective because Department management ensured there were no deficiencies within the investigation. Specifically, the de-escalation efforts used when appropriate and possible and the reasonableness of the force.

Category 2 Force

- Of the three investigations reviewed, all (100%) met the criteria for this objective because Department management ensured there were no deficiencies within the investigation. Specifically, the de-escalation efforts used when appropriate and possible and the reasonableness of the force.

Project No. 2024-18-A

The ten UOF investigations reviewed consisted of the following: four NCIs, four CAT1s, and two CAT2s.

Non-Categorized Force Incident

- Of the four investigations reviewed, all (100%) met the criteria for this objective because Department management ensured there were no deficiencies within the investigation. Specifically, the de-escalation efforts used when appropriate and possible and the reasonableness of the force.

Category 1 Force

- Of the four investigations reviewed, two (50%) met the criteria for this objective because Department management ensured there were no deficiencies within the investigation. Specifically, the de-escalation efforts used when appropriate and possible and the reasonableness of the force.
- The remaining two (50%) did not meet the criteria for this objective because management did not hold supervisors accountable for detecting and adequately investigating the use of force.

Category 2 Force

- Of the two investigations reviewed, all (100%) met the criteria for this objective because Department management ensured there were no deficiencies within the investigation.

Project No. 2024-31-A

The ten UOF investigations reviewed consisted of the following: two NCIs, five CAT1s, and three CAT2s.

Non-Categorized Force Incident

- Of the two investigations reviewed, all (100%) met the criteria for this objective because Department management ensured there were no deficiencies within the investigation. Specifically, the de-escalation efforts used when appropriate and possible and the reasonableness of the force.

Category 1 Force

- Of the five investigations reviewed, all (100%) met the criteria for this objective because Department management ensured there were no deficiencies within the investigation. Specifically, the de-escalation efforts used when appropriate and possible and the reasonableness of the force.

Category 2 Force

- Of the three investigations reviewed, all (100%) met the criteria for this objective because Department management ensured there were no deficiencies within the investigation.

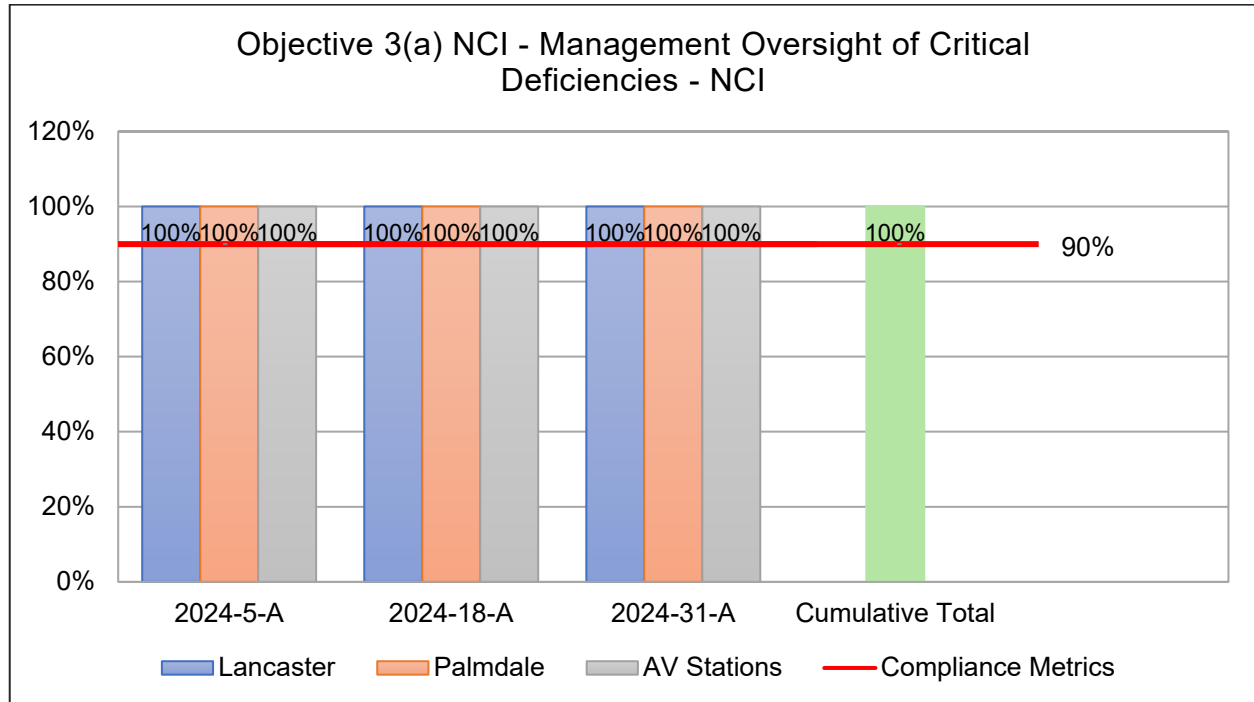
Cumulative Total

UOF Category	Criteria Met	Criteria Not Met	Total Reviewed	Cumulative %	Compliance Metrics %
NCI	10	0	10	100%	90%
CAT 1	10	2	12	83%	90%
CAT 2	8	0	8	100%	93%
Total	28	2	30	93%	

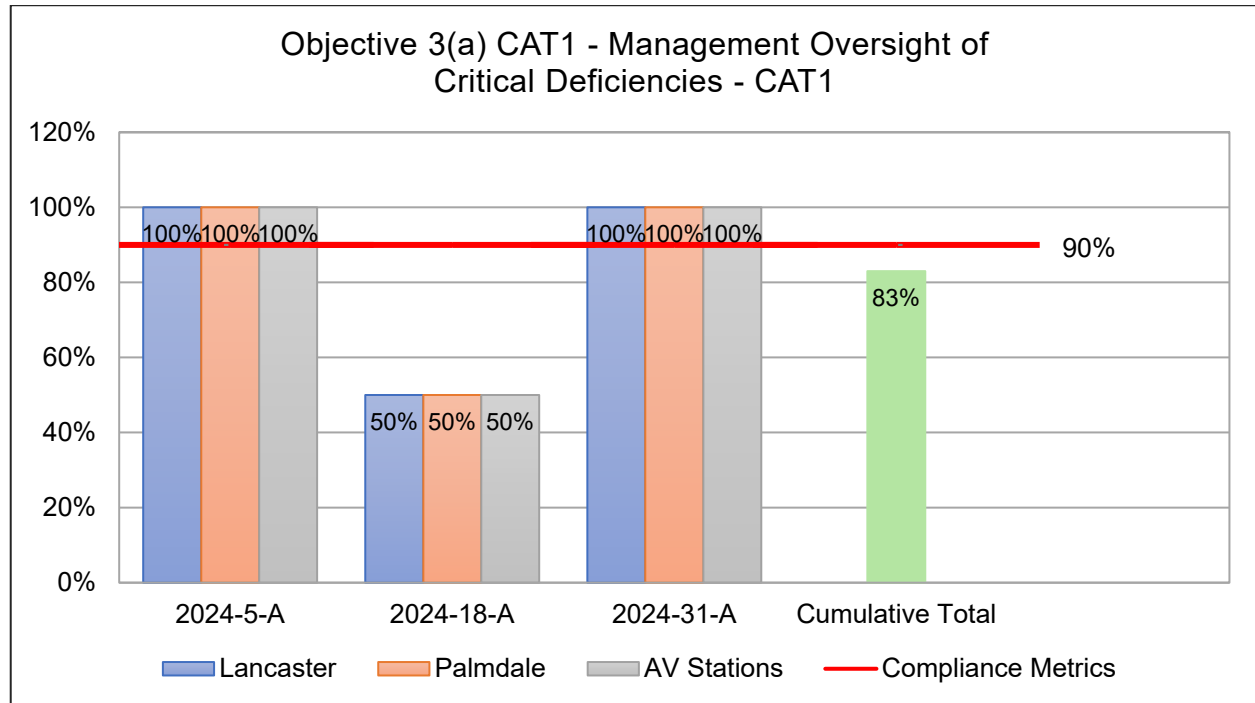
Of the 30 UOF investigations reviewed:

- Twenty-eight (93%) investigations met the criteria for this objective because Department management ensured there were no deficiencies within the investigation. Specifically, the de-escalation efforts used when appropriate and possible and the reasonableness of the force.
- The two (7%) remaining investigations did not meet the criteria for this objective because management did not hold supervisors accountable for detecting and adequately investigating the use of force.

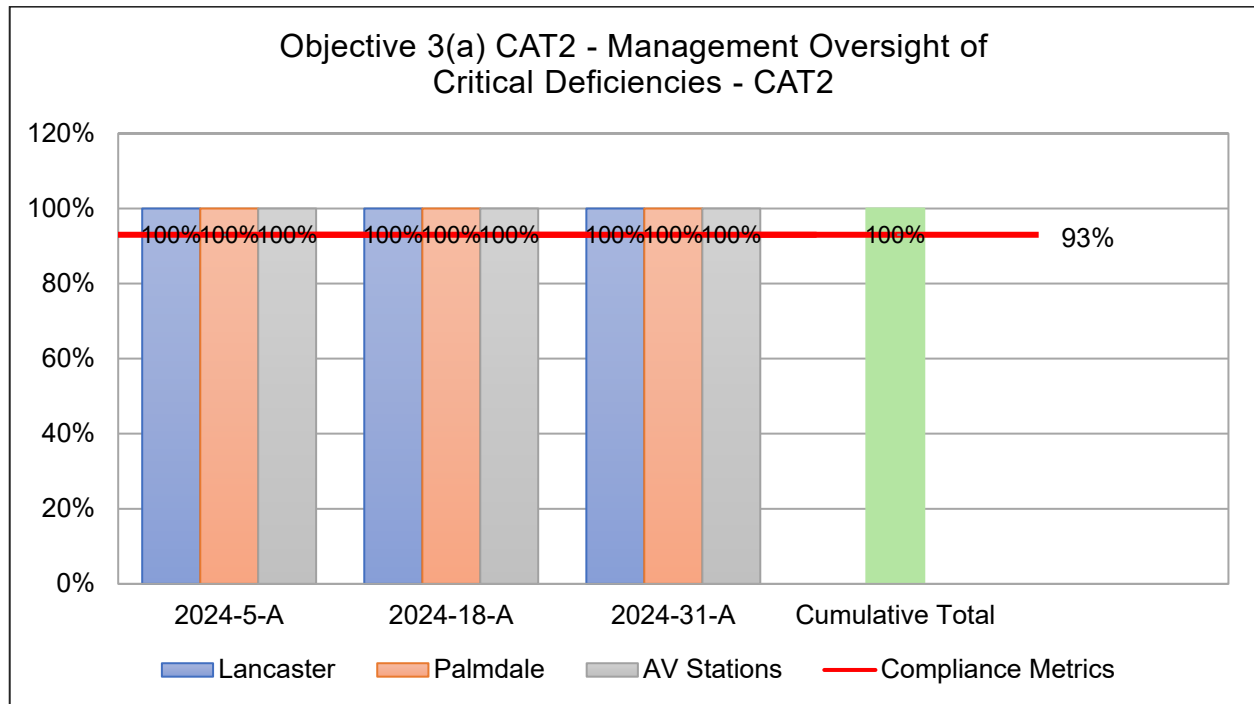
Summary of Cumulative Total for Objective 3(a) – Management Oversight of Critical Deficiencies – NCI



Summary of Cumulative Total for Objective 3(a) – Management Oversight of Critical Deficiencies – CAT1



Summary of Cumulative Total for Objective 3(a) – Management Oversight of Critical Deficiencies – CAT2



Noted Patterns, Trends, and Observations

As detailed in the charts above, the AV Stations met the established compliance metrics of 90% for NCIs and 93% for CAT2 investigations during the three audits previously conducted and cumulatively.

The AV Stations did not meet the compliance metrics of 90% cumulatively for CAT1 investigations. The auditors noted the compliance rate decreased from the first to the second audit. It appears the overall decrease occurred because two of the four CAT1 investigations reviewed in the second audit (2024-18-A) were not thorough, complete, and appropriately adjudicated by AV Stations' management in compliance with Department policies. IAB notifications for complaints of pain to the head and head injuries during an incident were not made or not made promptly. Additionally, AV Stations' management did not hold supervisors accountable for detecting and adequately investigating the use of force.

With a cumulative compliance rate of 83%, Objective 3(a) CAT 1 - Management Oversight of Critical Deficiencies is the second lowest compliance rate of the ten sub-objectives reviewed.

Recommendations

It is recommended that management hold supervisors accountable for thorough UOF investigations when personnel use actions that are not consistent with the SA or Department policy. Management should document any correction action taken in the “Determination by Unit Commander” section of the UOF review.

Objective No. 3(b) – Management Oversight of Non-Critical Deficiencies

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, USE OF FORCE, Management Oversight, Paragraphs 113-118 (August 2019), Compliance Measures, Section 1B (partial) states:

1. *The Monitor will use the following criteria to evaluate use-of-force adjudications for completeness and compliance with the SA requirements:*

B. Non-Critical Deficiency...*failure to ensure that all pertinent aspects of the incident were recorded accurately on the use-of-force form...*

Antelope Valley Settlement Agreement Compliance Metrics, USE OF FORCE, Management Oversight, Paragraphs 113-118 (August 2019), Compliance Measures, 4B and 4D states:

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

B. At least 85% of the Category 1 adjudications do not contain a Non-Critical Deficiency.

D. At least 85% of the Category 2 adjudications do not contain a Non-Critical Deficiency.

Procedures

Auditors evaluated a total of 30 UOF investigation packages, including BWC recordings, for each force incident to determine whether management reviewing the investigation held supervisors accountable for adequately documenting pertinent information regarding the incident on the Supervisor’s Report on Use of Force.

Summary of Findings

The auditors noted the following during their evaluation:

Project No. 2024-5-A

The ten UOF investigations reviewed consisted of the following: four NCIs, three CAT1s, and three CAT2s.

Non-Categorized Force Incident

- Of the four investigations reviewed, three (75%) met the criteria for this objective because Department management ensured pertinent information was contained in the Supervisor's Report on Use of Force.
- The remaining investigation (25%) did not meet the criteria for this objective because Department management failed to ensure pertinent information was contained in the Supervisor's Report on Use of Force.

Category 1 Force

- Of the three investigations reviewed, all (100%) met the criteria for this objective because Department management ensured pertinent information was contained in the Supervisor's Report on Use of Force.

Category 2 Force

- Of the three investigations reviewed, all (100%) met the criteria for this objective because Department management ensured pertinent information was contained in the Supervisor's Report on Use of Force.

Project No. 2024-18-A

The ten UOF investigations reviewed consisted of the following: four NCIs, five CAT1s, and one CAT2s.

Non-Categorized Force Incident

- Of the four investigations reviewed, all (100%) met the criteria for this objective because Department management ensured pertinent information was contained in the Supervisor's Report on Use of Force.

Category 1 Force

- Of the five investigations reviewed, two (40%) met the criteria for this objective because Department management ensured pertinent information was contained in the Supervisor's Report on Use of Force.
- The remaining three (60%) did not meet the criteria for this objective because management did not hold supervisors accountable for ensuring all pertinent aspects of the incidents were recorded accurately. There was conflicting information and deficiencies in the UOF forms.

Category 2 Force

- Of the one investigation reviewed, all (100%) met the criteria for this objective because Department management ensured pertinent information was contained in the Supervisor's Report on Use of Force.

Project No. 2024-31-A

The ten UOF investigations reviewed consisted of the following: two NCIs, five CAT1s, and three CAT2s.

Non-Categorized Force Incident

- Of the two investigations reviewed, all (100%) met the criteria for this objective because Department management ensured pertinent information was contained in the Supervisor's Report on Use of Force.

Category 1 Force

- Of the five investigations reviewed, four (80%) met the criteria for this objective because Department management ensured pertinent information was contained in the Supervisor's Report on Use of Force.
- The remaining one (20%) did not meet the criteria for this objective because management did not hold supervisors accountable for ensuring all pertinent aspects of the incidents were recorded accurately. There was conflicting information and deficiencies in the UOF forms.

Category 2 Force

- Of the three investigations reviewed, two (67%) met the criteria for this objective because Department management ensured pertinent information was contained in the Supervisor's Report on Use of Force.

- The remaining one (33%) did not meet the criteria for this objective because management did not hold supervisors accountable for ensuring all pertinent aspects of the incidents were recorded accurately. There was conflicting information and deficiencies in the UOF forms.

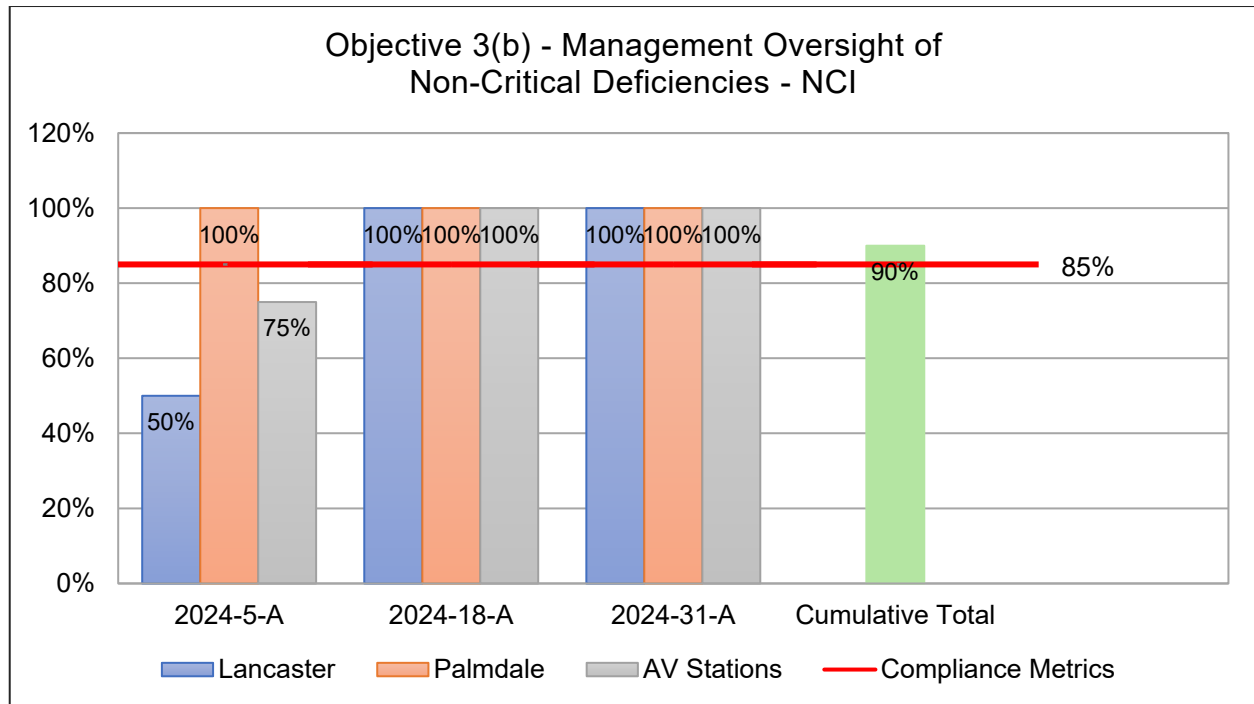
Cumulative Total

UOF Category	Criteria Met	Criteria Not Met	Total Reviewed	Cumulative %	Compliance Metrics %
NCI	9	1	10	93%	85%
CAT 1	9	4	13	69%	85%
CAT 2	6	1	7	86%	85%
Total	24	6	30	80%	

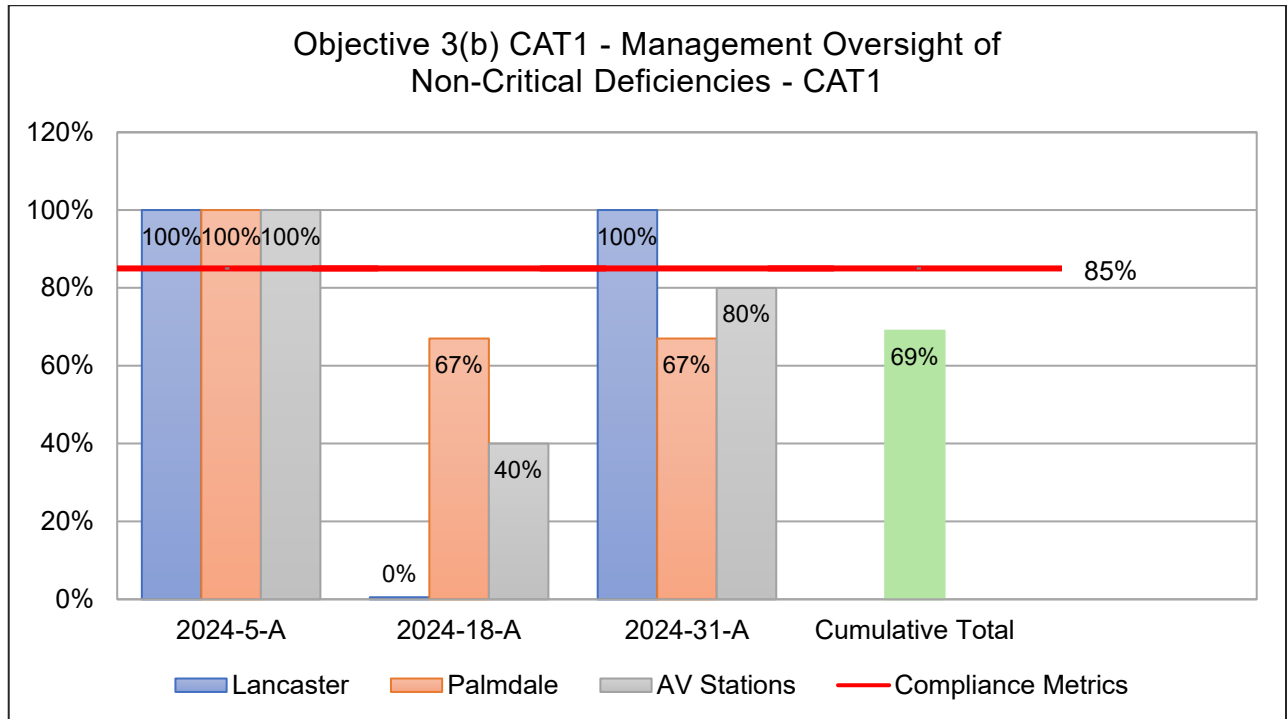
Of the 30 UOF investigations reviewed:

- Twenty-four (80%) met the criteria for this objective because Department management ensured pertinent information was contained in the Supervisor's Report on Use of Force.
- The remaining six (20%) did not meet the criteria for this objective because management did not hold supervisors accountable for ensuring all pertinent aspects of the incidents were recorded accurately. There were deficiencies in the UOF forms.

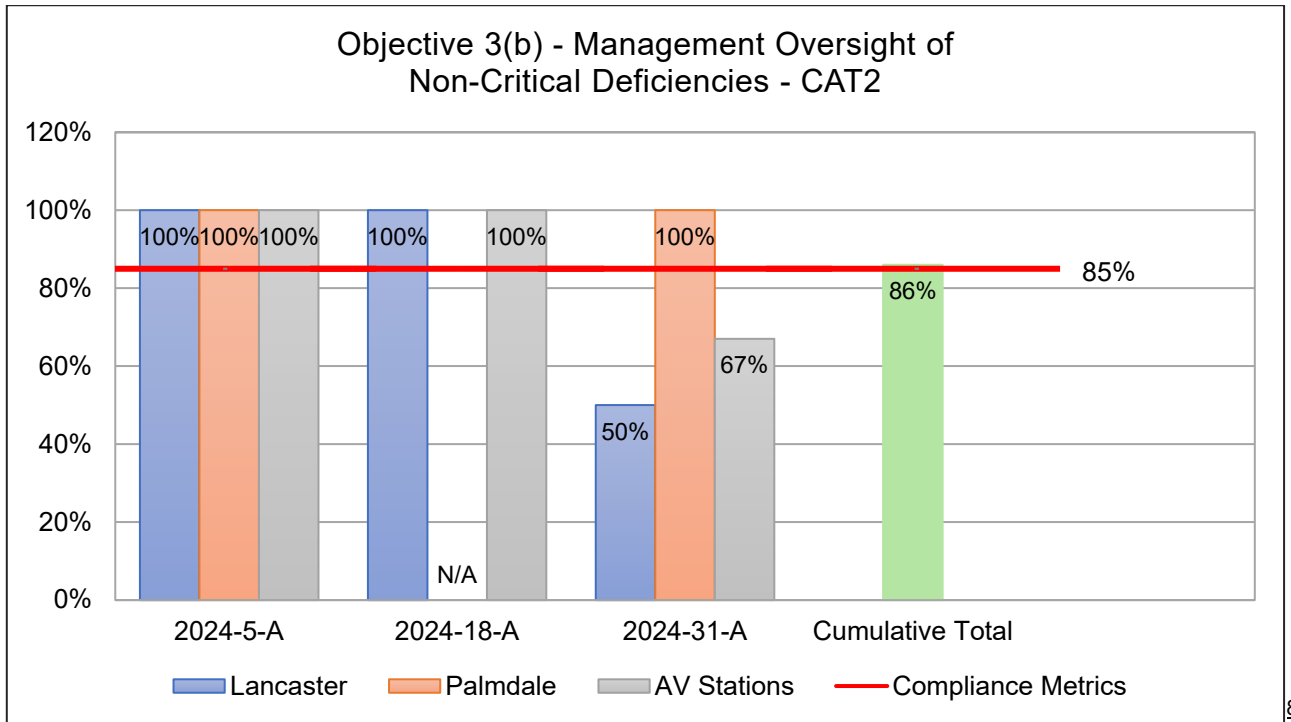
Summary of Cumulative Total for Objective 3(b) – Management Oversight of Non-Critical Deficiencies - NCI



Summary of Cumulative Total for Objective 3(b) – Management Oversight of Non-Critical Deficiencies – CAT1



Summary of Cumulative Total for Objective 3(b) – Management Oversight of Non-Critical Deficiencies – CAT2



Noted Patterns, Trends, and Observations

As detailed in the charts above, the AV Stations met the compliance metrics of 85% cumulatively for NCIs and CAT2 investigations.

The AV Stations did not meet the established compliance metrics of 85% cumulatively for CAT1 investigations. The auditors noted the compliance rate decreased from the first audit (2024-5-A) to the second audit (2024-18-A). It appears the overall decrease occurred because all pertinent information was not accurately documented in the Supervisor's Report on Use of Force for three of the five investigations reviewed. Additionally, the auditors noted the compliance rate increased from the second to the third audit (2024-31-A); however, the AV Stations did not meet the compliance metrics.

As the Department continually strides towards improvement, auditors observed ambiguity in the Supervisor's Report on Use of Force User's Guide, specifically the inconsistencies in the completion of the matrix. The guide, last revised July 2, 2015, is outdated and the Department should consider a comprehensive review and update to ensure the guide accurately reflects current policies, internal processes, and best practices to mitigate risks and enhance compliance.

With a cumulative compliance rate of 69%, Objective 3(a) CAT1 - Management Oversight of Critical Deficiencies is the lowest findings of the cases evaluated of the ten sub-objectives reviewed.

Recommendations

It is recommended management implement a "management monitoring process" to address and identify discrepancies or issues discovered during the review process and document corrective action taken in a database available to AV Stations supervisors.

Additionally, the Supervisor's Report on Use of Force User's Guide contains outdated information and lacks clarity. Specifically, in relation to this audit, the current guide does not specify whether supervisors should document each continuation of UOF on the matrix or the order in which the UOF should be recorded. This ambiguity allows for personal interpretation and inconsistencies in reporting. It is recommended the Field Operations Support Services Unit revise the user's guide to align with current UOF policies, internal processes, and best practices. This update should provide supervisors with clear guidance for accurately documenting and reviewing UOF investigations.

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Summary of Recommendations

Summary of Recommendations

No.	Objective No.	Audit Objectives	Recommendations
1	2(c)	Use of Force Assessment – Proportional Force	<p>A. It is recommended Department personnel continue to assess the totality of the circumstances, including the conduct of the subject leading up to the use of force. This assessment will assist personnel in determining a balance between the threat posed, the seriousness of the suspected crime, and the amount of force used.</p> <p>Department personnel should be reminded through monthly briefings that they are authorized to use only the amount of force consistent with Department policy to perform their duties. These briefings should be documented in the watch commander logs and/or an Automated Personnel In-Service (APIS) roster.</p>
2	3(a)	Management Oversight of Use of Force – Management Oversight of Critical Deficiencies	<p>A. It is recommended that management hold supervisors accountable for thorough UOF investigations when personnel use actions that are not consistent with the SA or Department policy. Management should document any correction action taken in the “Determination by Unit Commander” section of the UOF review.</p>
3	3(b)	Management Oversight of Use of Force – Management Oversight of Non-Critical Deficiencies	<p>A. It is recommended management implement a “management monitoring process” to address and identify discrepancies or issues discovered during the review process and document corrective action taken in a database available to AV Stations supervisors.</p> <p>B. It is recommended the Field Operations Support Services Unit revise the user’s guide to align with current UOF policies, internal processes, and best practices. This update should provide supervisors with clear guidance for accurately documenting and reviewing UOF investigations.</p>

CONCLUSION

The AAB recognizes the AV Stations' ongoing efforts to continue implementing positive changes and enforce the required policies with procedures to institute meaningful changes within the AV community.

The auditors noted the AV Stations utilized de-escalation techniques, when possible, prior to and during the use of force. Overall, the AV Stations appropriately assessed situations, utilized time as well as opportunities to redeploy and/or contain subjects to their advantage, and requested additional resources, such as the Mental Evaluation Team, when necessary. Additionally, it was determined the AV Stations used only the level of force proportional to the situation and within department policy to gain control of a combative or resistive subject, when needed. Once control was achieved, the level of force was reduced.

The review also identified areas where improvement is needed such as management oversight of use of force. The AV Stations received their lowest cumulative compliance rate of 69%, respectively, for the sub-objective, Management Oversight of Non-Critical Deficiencies. Although this did not change the reliability of the investigations, it underscores the importance of management oversight to ensure AV Stations management are held accountable for complete reviews of UOF investigations and confirm all required details and pertinent information regarding incidents are thoroughly documented and recorded for proper analysis and adjudication.

While conducting the audits, auditors identified areas of concern (other related matters) AV Stations' management should consider. While these were not the primary focus of the audit, they represent noteworthy best practices. In three instances, desk personnel failed to follow call taking procedures for high-risk calls for services, neglecting to ask pertinent questions or initiate protocols for subjects with mental illness. They also failed to request a field sergeant's response to the scene when required by policy. Additionally, there were inconsistencies in the SA and LASD UOF definitions of "active resistance" and "passive resistance." The Department should clarify these terms, to ensure consistency with the SA definition and how they relate to the UOF policy.

This review provides an assessment of performance within the AV Stations. The AAB will continue to conduct 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 goals to adhere to the Agreement and meeting 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.

FOLLOW-UP PROCEDURES

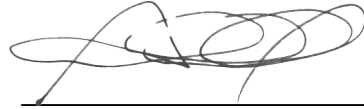
Within 60 days of distributing this review to the involved Department executives and Bureaus, the AAB will conduct a follow-up inspection. This inspection will assess whether the AV Stations have responded to the audit recommendations and implemented the necessary operational improvements. As part of the follow-up, the AAB will request proof of corrective action to verify whether the recommendations have been adequately addressed and if the AV Stations are making concerted efforts to meet the compliance metrics.

REFERENCE DOCUMENTS

Part I of Use of Force: De-escalation and Use of Force Assessment:

- [2024-5-A](#) – Population Time Period (October 1, 2023, through December 31, 2023)
- [2024-18-A](#) – Population Time Period (January 1, 2024, through March 31, 2024)
- [2024-31-A](#) – Population Time Period (April 1, 2024, through June 30, 2024)

USE OF FORCE AUDIT
DE-ESCALATION AND USE OF FORCE ASSESSMENT
ANTELOPE VALLEY STATIONS
PROJECT NO. 2024-51-A



8/13/2025

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