

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

Part I of Public Complaints Audit:

Availability and Acceptance of Complaint Information and Initiation and Classification of Complaints

Antelope Valley Stations Project No. 2025-1-A

Prepared By:

Audit and Accountability Bureau



Los Angeles County Sheriff's Department Audit and Accountability Bureau

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Antelope Valley Stations

Project No. 2025-1-A

AUDIT REPORT

PURPOSE

The Audit and Accountability Bureau (AAB) conducted the Public Complaints Audit under the authority of the Los Angeles County Sheriff's Department (LASD or the Department), pursuant to the United States Department of Justice (US-DOJ) Antelope Valley (AV) Settlement Agreement¹ (Agreement). The purpose of Part I audits (2025-1-A, 2025-11-A, and 2025-24-A) was to determine whether the availability and acceptance of public complaints complied with the Agreement. Specifically, the audit assessed whether Lancaster and Palmdale Stations (AV Stations) complied with paragraphs 124, 125, 126, 128, 132, 140, and 149 of the Agreement.

As mandated by the Agreement, the primary objectives of the audit were to ensure the availability of complaint information, the acceptance of public complaints, and that Watch Commander's Service Comment Report (WCSCR) investigations were initiated, properly classified, and completed² in a timely manner. These objectives helped assess the Department's transparency practices with the public, as well as its compliance with established policies and the terms of the Agreement.

The results of each audit report were based on the AV Stations' adherence to the Agreement's provisions, the US-DOJ and Monitoring Team (MT) established Agreement Compliance Metrics (compliance metrics), and Department policies. The AAB's audit findings and recommendations provided the MT with essential data for consideration to use toward compliance³ and assessed whether the Department met its obligations under the Agreement.

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

² Completed refers to the approval of investigations at the NPD level.

³ Compliance when mentioned throughout the report refers to whether the AV Stations met the established compliance metrics.

Paragraph 140 of the Agreement states:

LASD shall conduct a semiannual, randomized audit of LASD-AV's complaint intake, classification, and investigations. This audit will assess whether complaints are accepted and classified consistent with policy, investigations are complete, and complaint dispositions are consistent with a preponderance of the evidence.

Additionally, Paragraph 149 of the Agreement states:

The Monitor shall... determine whether LASD has implemented and continues to comply with the material⁴ 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.

The auditors independently conducted the audits to ensure the audit process, and its outcomes were accurate, thorough, and in line with auditing standards. Key areas of emphasis included comprehensive strategies in audit planning, such as gathering necessary data, and establishing audit populations. This approach ensured the audit evidence was reliable and relevant to the Agreement and the compliance metrics.

The Public Complaints Audits were conducted in the following manner:

Part	Audit
I	Availability and Acceptance of Complaint Information and Initiation and Classification of Complaints
II	Investigation of Public Complaints
III	Adjudication of Public Complaints

This audit is scheduled to be recurring. The table below lists the project numbers, due dates, and population time periods, which are subject to change.

Project Numbers, Due Dates, and Population Time Periods

Project No.	Projected Due Date	Population Time Period
2025–1–A	April 2025	July 1, 2024, through July 31, 2024
2025–11–A	November 2025	TBD
2025-24-A	December 2025	TBD

⁴ Per the MT, "material" refers to relevant and important information that is generally significant enough to determine or affect the outcome of an issue.

The AAB conducted this audit under the guidance of Generally Accepted Government Auditing Standards (GAGAS).⁵ The AAB determined whether the evidence obtained was sufficient and appropriate to provide a reasonable basis for the findings based on the audit objectives.

BACKGROUND

On April 28, 2015, the County of Los Angeles, the Department, and the US-DOJ entered into the Agreement 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 responsible for implementing the mandated stipulations of the Agreement, ensuring both public and deputy safety, while fostering renewed public trust in the LASD.

The AAB was authorized by the Sheriff of Los Angeles County, the US-DOJ, and the MT to conduct audits of the Department. To improve efficiency and effectiveness, the AAB shifted its audit approach from conducting full-scale audits to limited scope audits. These limited scope audits focus on a narrow set of audit objectives and specific audit populations, which are referred to by the AAB as "mini" audits. The purpose of the mini audits was intended to provide timely feedback to the AV Stations, facilitate opportunities for operational improvements, and demonstrate an increasing commitment toward meeting the established compliance metrics.

OBJECTIVES, SCOPE, AND METHODOLOGY

The Department recognizes the importance of evaluating Department members' actions when interacting with members of the public. Department members' interactions with the AV community are essential to developing and maintaining community trust. This audit provided an opportunity to identify areas for process improvement and implement corrective actions where necessary.

Audit Scope and Criteria

The scope of this audit evaluated the aspects of the availability and acceptance of public complaint information, the initiation and classification of WCSCR investigations, and the AV Station's timely completion and approval of the WCSCR investigations. The Department's compliance was measured against the compliance metrics, along with additional clarification provided by the MT.

⁵ The GAGAS, also known as the Yellow Book, is issued by the Comptroller General of the United States through the U.S. Government Accountability Office and refers to *Government Auditing Standards*, July 2018 Revision, Technical Update April 2021.

The AAB has carefully developed the audit objectives, scope, and methodology, focusing on the Agreement and the established compliance metrics.

In prior discussions with the MT, the audit objectives and methodologies were adjusted as necessary to ensure appropriate audit test work was conducted and relevant audit documentation was collected and analyzed.

Audit Population and Sampling

The AAB specifically designed the audits to provide the MT with essential data for consideration to use toward compliance and assessed whether the Department is meeting its obligations under the Agreement. Parts II and III of the Public Complaints Audit, along with Objective 3 – Initiation and Classification of Complaints for Part I of the Public Complaints Audit, used the same audit population.

The audit population for Objective 1 – Availability of Complaint Information consisted of all currently displayed complaint informational posters, brochures, and complaint forms at the nine required LASD and non-LASD locations during the audit period.

Additionally, the auditors attended AV Stations' Community Advisory Committee (CAC) meetings and evaluated meeting minutes, as well as supporting documentation to determine whether informational materials were requested and provided to community groups upon their request.

The audit population for Objective 2 – Acceptance of Complaint Information consisted of mock⁶ public complaints used to evaluate the adequacy of the complaint acceptance process. The auditors filed online complaints via the Department's website (LASD.org) and mailed the complaints to the AV Stations and the Professional Standards Division (PSD).⁷ Additionally, the auditors made telephone complaints to the AV Stations and the Sheriff's Information Bureau (SIB).⁸

⁶ A mock complaint refers to simulated or test complaints submitted by the auditors during the audit to assess the complaint intake, handling, and resolution process.

⁷ Per the Agreement, mail-in complaints can be submitted to PSD. If PSD Operations determines it is a complaint, the complaint will be submitted to the PSD's Internal Affairs Bureau (IAB) for distribution to the AV Stations.

⁸ SIB is responsible for accepting telephone complaints on the Department's 800 Number.

The table below lists the number of mock public complaints tested for acceptance at the AV Stations, PSD, and SIB during the audit period:

Audit Population and Sample - Acceptance of Complaints

Audit Project No.	Electronic Complaints		Mail-in Complaints			Telephone Complaints			
	Lancaster	Palmdale	Lancaster	Palmdale	PSD	Lancaster	Palmdale	SIB	
2025-1	-A	4	4	4	4	4	8	8	8
2025-1	1-A	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
2025-24	4-A	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD

Further, the audit population for Objective 3 – Initiation and Classification of Complaints, consisted of completed WCSCR investigations.

The auditors identified the investigations for the audit period in the Performance Recording and Monitoring System (PRMS),⁹ and reconciled the data with the Report Navigator¹⁰ to ensure the population selected was accurately accounted for.

The auditors only evaluated completed investigations. This allowed for the evaluation of the effectiveness of the management review process. The population consisted of all WCSCR investigations initiated from July 1, 2024, through July 31, 2024.

Lancaster Station had a total of 15 WCSCR investigations in PRMS. Of these, three were commendations, one was a duplicate investigation which was voided by the Station, and three were reviewed under the 2024 Public Complaints Audits, Part II – Initiating and Classifying of Public Complaints (Project No. 2024-57-A), and Part III – Investigation and Management Review & Oversight of Public Complaints (Project No. 2024-58-A). One investigation was a mock complaint conducted in the 2024 Part I – Assessment of Availability and Acceptance of Complaint Information (Project No. 2024-56-A) and was voided. The remaining seven investigations were reviewed for this audit.

⁹ The PRMS is a web-based application that systematically records data relevant to incidents involving uses of force, shootings, and commendations/complaints regarding Sheriff's Department personnel. In addition, PRMS tracks the progress of administrative investigations, civil claims and lawsuits, discovery motions, employee commendations, preventable, traffic, collisions, custody complaints, special conditions that the Department handles.

¹⁰ Report Navigator is a database used by the Department to identify current and overdue complaint investigations.

Palmdale Station had a total of 16 WCSCR investigations in PRMS. Of these, four were commendations, and one was reviewed under the 2024 Public Complaints Audits, Part II – Initiating and Classifying of Public Complaints (Project No. 2024-57-A) and Part III – Investigation and Management Review & Oversight of Public Complaints (Project No. 2024-58-A). Two investigations from Palmdale Station, initially classified as WCSCRs, were later reclassified as Administrative Investigations and analyzed under Objective 3(a) – Prompt Initiation of Complaint and Objective 3(b) – Discouraging or Inhibiting a Complaint. These investigations did not apply to the remaining objectives because one was promptly referred to the Internal Affairs Bureau, while the Unit Commander initiated a unit-level investigation for the other. As a result, nine investigations were reviewed for all other objectives in this audit.

Combined, a total of 16 completed WCSCR investigations were reviewed for the audit, seven from Lancaster Station and nine from Palmdale Station. The investigations initiated and audited are indicated below:

Audit Population - Initiation and Classification of Complaints

Audit Project No.	WCSCR Inve	stigations Initiated	WCSCR Investigations Audited			
	Lancaster	Palmdale	Lancaster	Palmdale		
2025-1-A	15	16	7	911		
2025-11-A	TBD	TBD	TBD	TBD		
2025-24-A	TBD	TBD	TBD	TBD		

Validation of Audit Population

Public complaints are documented in WCSCR investigations; however, they can also be discovered through other Department investigations or documents, not all of which result in the initiation of a public complaint investigation. Those areas include civil claims, lawsuits, Watch Commander telephone calls, Watch Commander's Log (WCL), and the Mobile Digital Computer (MDC)¹².

¹¹ Of the 11 investigations analyzed, two were analyzed under Objective 3(a) – Prompt Initiation of Complaint and Objective 3(b) – Discouraging or Inhibiting a Complaint. They did not apply to the other objectives because of the pending Administrative Investigation.

¹² A Computer system installed in patrol vehicles, enabling Department members to access Department databases, communicate with dispatch, and perform operational tasks in the field.

The AAB reviewed and validated these areas to assess the validity of the audit population, as outlined below.

1. Civil Claims and Lawsuits

Civil claims and lawsuits can contain allegations of misconduct that went unaddressed. To validate public complaints from civil claims and lawsuits, the auditors identified and reviewed all civil claims and lawsuits filed during the audit period of July 1, 2024, through July 31, 2024. The auditors evaluated the documentation and relevant associated media, such as video recordings, to determine whether they contained unaddressed allegations of misconduct. The auditors identified three civil claims (two for Lancaster Station and one for Palmdale Station); however, the two for Lancaster Station did not contain allegations of misconduct. As a result, one civil claim for Palmdale Station was evaluated.

Similarly, the auditors identified three lawsuits (one for Lancaster Station and two for Palmdale Station); however, the one for Lancaster Station did not involve Department members. As a result, two lawsuits for Palmdale Station were evaluated.

2. Watch Commander's Recorded Telephone Line and Log

The auditors randomly identified a specific week (March 9, 2025, through March 15, 2025) and reviewed the telephone calls from the Watch Commander's line to determine whether a supervisor should have initiated a complaint or provided a suitable justification in the WCL explaining why a WCSCR investigation was not necessary. The auditors evaluated a total of 173 telephone calls.

The auditors also evaluated all entries in the WCL for the audit period of March 9, 2025, through March 15, 2025, to determine if any log entry documented an allegation of misconduct that resulted in a WCSCR. The auditors evaluated a total of 151 entries in the WCL.

3. Mobile Digital Computer Log

The auditors evaluated all AV Stations' supervisors' entries in the MDC Log with clearance code 777 (assist citizen), for the audit period of July 1, 2025, through July 31, 2025, which may be used to document a contact with a member of the public regarding any allegation determined not to be a complaint. The auditors evaluated the one entry in the MDC Log with a 777 clearance code.

Using a one-tailed statistical test with a 95% confidence level and a 4% error rate, the auditors identified a statistically valid random sample of incidents for the audit period to determine if sampling would be cost effective. Given the minimal size of the resulting sample, the auditors evaluated the entire audit population as indicated.

The Department accepts public complaints in-person, electronically via LASD.org, by mail, and by telephone. As such, the auditors evaluated these types of public complaints as specified in each audit objective.

The body-worn camera (BWC)¹³ recordings, telephone calls from the Watch Commander lines recorded in the NICE Inform system,¹⁴ WCL entries, civil claims and lawsuits filed, and the MDC with clearance code 777 (assist citizen) were evaluated for the applicable audit objectives and samples. The auditors provided a detailed summary of procedures and audit findings within each objective.

Audit Procedures

The auditors reviewed the compliance metrics related to public complaints and examined the AV Stations' processes, materials, and documents, including logs, correspondence, and audio recordings. Additionally, the auditors submitted mock complaints to evaluate the process by which complaint materials were made available and the acceptance of public complaints.

The auditors conducted detailed testing using audit tools designed for various audit objectives. The auditors analyzed the information gathered and documented their findings on audit work papers¹⁵, which underwent further levels of review.

In instances when the auditors observed potential misconduct not previously identified by station management, an interim audit memorandum detailing the incident would be submitted to the North Patrol Division (NPD) for their review and disposition.

Summary of Findings

This audit consisted of three main objectives with a total of 14 sub-objectives. The AV Stations were evaluated separately for each sub-objective. The results were then combined to assess whether they collectively complied with the compliance metrics.

¹³ A BWC is a video and audio recording device worn by a Department member that allows an event to be recorded and saved as a digital file.

¹⁴ The NICE Inform is an online audio storage system used to archive incoming and outgoing calls (with additional capabilities).

¹⁵ Audit work papers are formally known as audit working papers and are created, gathered, and compiled by the auditor throughout the audit process. These documents provide the supporting documentation for the audit findings and conclusions.

The table below outlines the audit objectives and their corresponding compliance metrics findings:

Summary of Compliance Metrics Findings

Obj. No.	Audit Objectives	Lancaster Palmdale %		AV Total	Compliance Metrics %			
1	AVAILABILITY OF COMPLAINT INFORMATION							
1(a)	Specified Facilities	83%	67%	78%	89%			
1(b)	Community Groups	NIN ¹⁶	NIN	NIN	100%			
1(c)	Department Website			100%	100%			
1(d)	Station Websites	100%	100%	100%	100%			
2	ACCEPTING PUBLIC COMPLAINTS							
2(a)	Mail-in Form 100% 1		100%	100%	100%			
2(b)	Email Complaints	100% 100%		100%	100%			
2(c)	Department 800 Number			75%	100%			
2(d)	Complaint Calls Transferred to Supervisor without Unnecessary Delay	88% 88%		88%	100%			
2(e)	Supervisor's Willingness to Accept Telephone Complaints	100%	100%	100%	100%			
3	INITIATION AND CLASSIFICATION OF COMPLAINTS							
3(a)	Prompt Initiation of Complaint	100%	93%	95%	100%			
3(b)	Discouraging or Inhibiting a Complaint	100%	100%	100%	95%			
3(c)	Watch Commander Initiates a WCSCR or Provides Justification in the Watch Commander's Log	43%	50%	45%	100%			
3(d)	Field Supervisor's Documentation of Contacts That Did Not Constitute a Complaint	NIN	NIN	NIN	100%			
3(e)	Service Versus Personnel Complaints	100%	89%	94%	95%			

¹⁶ NIN stands for "No Incidents Noted."

Detailed Findings

This report provides detailed information on the findings noted during the audit for all objectives.

Objective No. 1 - Availability of Complaint Information

This objective evaluated whether public complaint information was made available as specified in the established compliance metrics.

Objective No. 1(a) - Specified Facilities

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Public Access to Complaint Information, Paragraphs 124 and 125 (partial) (October 2019), Section 3A, 3B, and 3C states:

- 3. LASD will be deemed in substantial outcomes compliance when it:
 - A. Displays approved informational materials, including LASD's "Procedures for Public Complaints" brochures (includes a complaint form) in English and Spanish and posters, which inform the public about LASD's process for filing public complaints.
 - B. Ensures that the below locations have informational materials "Procedures for Public Complaints" brochures readily available for the public when the location is operable.
 - 1. Lancaster Station Lobby
 - 2. Lake Los Angeles Library
 - 3. Lancaster Library
 - 4. Quartz Hill Library
 - 5. Michael Antonovich Antelope Valley Court House (at the Sheriff's public counter)
 - 6. Antelope Valley Juvenile Court (at the Sheriff's public counter)
 - 7. Palmdale Station Lobby
 - 8. Littlerock (County) Library
 - 9. Acton/Agua Dulce (County) Library

C. Upon inspection, **no more than one** of the operable locations listed above fails to have any of the requisite complaint materials available. The unavailability of complaint material at a non-LASD facility will not be considered a failure if LASD has documented they have made reasonable efforts within 30 days preceding the inspection(s) to ensure complaint material was readily available at the location.

Procedures

The auditors conducted unannounced inspections of the designated locations to verify whether the required complaint-related materials, including LASD's "Procedures for Public Complaints" brochures, complaint forms, and informational posters were displayed in both English and Spanish. The auditors took photographs of the complaint-related materials at each site to determine whether the information was clear and accessible to the public. If the required materials were not displayed at the AV Stations, the auditors inquired with desk personnel about the availability of additional materials to replenish their displays. If the required materials were not displayed at locations outside the Department's control (such as libraries and courts), the auditors confirmed whether LASD documented a reasonable effort to display the materials within the past 30 days. This documentation was verified through the Watch Commander's Log in the Station/Bureau Administration Portal (SBAP).

Findings

For the AV Stations combined, seven (78%) of the nine inspected locations met the criteria for this objective because they had the required informational materials, including LASD's "Procedure for Public Complaints" brochures, complaint forms, and informational posters displayed in both English and Spanish. The remaining two (22%) locations did not meet the criteria because the LASD's "Procedure for Public Complaints" brochures were not displayed in both English and Spanish.

For Lancaster, five (83%) of the six inspected locations had the necessary informational materials, including LASD's "Procedure for Public Complaints" brochures, complaint forms, and informational posters displayed in both English and Spanish. The remaining one location (17%) did not meet the criteria because the LASD's "Procedure for Public Complaints" brochures were not displayed in both English and Spanish.

¹⁷ There are no established compliance metrics for this audit objective. Per paragraph 3C, no more than one of the operable locations may fail to meet the criteria. Therefore, the auditors documented 89% to be an appropriate compliance metric.

¹⁸ The SBAP is a data entry system designed to collect and track data related to risk management incidents, which are primarily used at a station level. The system includes data on uses of force, traffic collisions, public comments, pursuits, administrative investigations, shots fired, employee injuries, and lawsuits and civil claims.

For Palmdale, two (67%) of the three inspected locations had the necessary informational materials, including LASD's "Procedure for Public Complaints" brochures, complaint forms, and informational posters displayed in both English and Spanish. The remaining one location (33%) did not meet the criteria because the LASD's "Procedure for Public Complaints" brochures were not displayed in both English and Spanish.

Specifically:

SFL-1¹⁹: During the April 15, 2025, inspection at Lancaster Station, the auditors noted that while complaint forms and informational posters were displayed in both English and Spanish, the LASD's "Procedures for Public Complaints" brochures were available only in Spanish. The auditors inquired with the desk personnel about the location of the complaint-related materials and were informed the materials are currently out of stock and an order will be placed to replenish them. There was no WCL documentation explaining the absence of English brochures or indicating any effort to address the issue.

SFP-1²⁰: During the April 15, 2025, inspection at Palmdale Station, the auditors noted that while complaint forms and informational posters were displayed in both English and Spanish, there were no LASD's "Procedures for Public Complaints" brochures available in English or Spanish. The auditors inquired with the desk personnel about the location of the complaint-related materials and were informed the personnel did not know. There was no WCL documentation explaining the absence of both English and Spanish brochures or indicating any effort to address the issue.

Recommendations

It is recommended the Watch Commander conduct daily inspections of the complaintrelated materials during each shift to confirm the materials are available and displayed in both English and Spanish. These inspections should be documented in the WCL and include the date and time of the inspection, the name of the inspecting personnel, status of materials (e.g. available, missing, damaged) and any corrective actions taken, if applicable.

¹⁹ SFL refers to the Specified Facilities for Lancaster Station. The number represents the sample being referred to of those reviewed for Lancaster Station.

²⁰ SFP refers to the Specified Facilities for Palmdale Station. The number represents the sample being referred to of those reviewed for Palmdale Station.

Objective No. 1(b) - Community Groups

<u>Criteria</u>

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Public Access to Complaint Information, Paragraphs 124 and 125 (partial) (October 2019), Section 3E states:

E. Informational materials are made available to community groups on request.

Procedures

The auditors attempted to attend the AV Stations' CAC meetings unannounced during the audit period to assess whether informational materials were made available and provided to community groups at their request. However, no Town Hall meetings took place during the audit period. As a result, the auditors were unable to evaluate the corresponding CAC meeting agendas and minutes to determine whether any community members requested informational materials and whether those requests were fulfilled. To supplement this limitation, the auditors interviewed the Palmdale CAC chair to determine whether any complaints had been received regarding access to complaint materials. The Palmdale chair stated community members did not request complaint materials or complain they were unable to access materials to file a complaint. The Lancaster chair did not respond to the auditors' request for an interview.

Findings

The auditors were unable to attend any CAC meetings during the audit period because no Town Hall meetings took place. As a result, they could not determine whether community members requested informational materials or whether such requests were fulfilled. Additionally, informational complaint materials were observed at the AV Stations' lobbies during the audit period. There were no known requests for informational materials and no complaints from community groups or members about unavailability. Therefore, the compliance rate is "NIN²¹," as no incidents relevant to the criteria occurred during the audit period.

Recommendations

There are no recommendations because the compliance rate is "NIN," as no incidents pertained to the criteria.

²¹ NIN refers to "No Incidents Noted."

Objective No. 1(c) - Department Website

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Public Access to Complaint Information, Paragraph 124 and 125 (partial) (October 2019), Section 3D states:

D. At all times, complaint material is available on LASD-AV station websites.

Procedures

The auditors reviewed the Department's website (LASD.org) to access the "File a Complaint" tab under the "Contact Us" drop-down menu. The auditors verified whether the public complaint information was accessible in both English and Spanish. To view the information in Spanish, the auditors utilized the drop-down language menu or clicked the Spanish link provided on the webpage.

Findings

The Department (100%) met the criteria for this objective because complaint information was available in both English and Spanish on the Department's website (LASD.org).

Recommendations

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

Objective No. 1(d) - Station Websites

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Public Access to Complaint Information, Paragraphs 124 and 125 (partial) (October 2019), Section 3D states:

D. At all times, complaint material is available on LASD-AV station websites.

Procedures

The auditors accessed the Department's website (LASD.org) and navigated to the "Your LASD" tab to access the drop-down menu for AV Stations. The auditors then selected the "Contact Us" tab, followed by the "File a Complaint" tab, and verified whether the public complaint information was available in both English and Spanish. To view the information in Spanish, the auditors utilized the drop-down language menu or clicked the Spanish- link provided on the webpage.

Findings

For the AV Stations combined, all (100%) met the criteria for this objective, and public complaint information was available in both English and Spanish on the respective AV Stations' webpages (LASD.org/Lancaster and LASD.org/Palmdale).

For Lancaster Station, all (100%) met the criteria for this objective, and public complaint information was available in both English and Spanish on the respective AV Station's webpages (LASD.org/Lancaster and LASD.org/Palmdale).

For Palmdale Station, all (100%) met the criteria for this objective, and public complaint information was available in both English and Spanish on the respective AV Station's webpages (LASD.org/Lancaster and LASD.org/Palmdale).

Recommendations

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

Objective No. 2 - Acceptance of Complaints

This objective evaluated the LASD's acceptance of public complaints as specified in the established compliance metrics.

Objective No. 2(a) – Mail-in Form

Criteria

There were no applicable compliance metrics for this objective. However, Paragraph 125 of the Agreement states, "LASD will continue to accept all personnel complaints, including anonymous and third-party complaints, for review and investigation. Complaints may be made in writing or verbally, in person or by mail, telephone (or TDD), facsimile, or electronic mail, as well as in the field."

In addition, Paragraph 126 of the Agreement states, "The refusal to accept a personnel complaint, discouraging the filing of a complaint, or providing false or misleading information about filing a complaint, shall be grounds for discipline, up to and including termination."

According to the proposed draft of the Service Comment Report (SCR) Handbook²² (August 2022), within five business days of receiving a complaint, the unit's Operations staff shall mail an acknowledgment letter to the reporting party. This letter acknowledges the complaint was received by the unit. The letter shall be sent regardless of whether the complaint was made in person, by telephone, electronically, or by mail.

The Department's mail-in form can be completed and mailed to any Sheriff's station or to:

LASD Professional Standards Division 211 West Temple St Los Angeles, CA 90012

²² Proposed draft SCR Handbook, revised 08/01/2022.

Procedures

The auditors sent mock complaints in both English and Spanish to the AV Stations and the PSD via United States mail. This process evaluated whether the mail-in complaint forms were received and whether the Department contacted the complainant within five business days of receipt. Each AV Station and the PSD received four mail-in complaint forms two in Spanish and two in English, for a total of 12 forms. These forms included the complainant's contact information, the location or general area of the incident, a vague description of the employee involved, and a summary of the complaint.

If no response was received, the auditors reviewed the PRMS to determine whether a WCSCR was initiated for the mail-in complaints. Additionally, the auditors examined the WCL for any entries regarding the status of the complaints.

Findings

For the AV Stations and the PSD combined, all 12 (100%) met the criteria for this objective because the mail-in form was received, and contact was initiated within five business days of receipt.

For Lancaster Station, all four (100%) met the criteria for this objective because the mailin form was received, and contact was initiated within five business days of receipt.

For Palmdale Station, all four (100%) met the criteria for this objective because the mailin form was received, and contact was initiated within five business days of receipt.

For the Professional Standards Division, all four (100%) met the criteria for this objective because the mail-in form was received, and contact was initiated within five business days of receipt.

Recommendations

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

Objective No. 2(b) - Email Complaints

<u>Criteria</u>

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

A. **At all times**, LASD's telephone and internet systems allow for acceptance of personnel complaints via telephone, fax, and email.

Procedures

The auditors submitted mock email complaints in both English and Spanish to the AV Stations through the Department's email web portal on LASD.org. This process evaluated whether the complaints were properly accepted and whether the AV Stations initiated contact with the complainants. Each complaint included the complainant's contact information, the location or general area of the incident, a description of the employee involved, and a brief summary of the complaint. The auditors also documented the dates each complaint was submitted, as well as the dates when the AV Stations received and responded to the emails.

Findings

For the AV Stations combined, all (100%) emails met the criteria for this objective because the complaint was accepted, and the Department initiated contact with the complainant in their preferred language.

For Lancaster Station, all (100%) emails met the criteria for this objective because the complaint was accepted, and the Department initiated contact with the complainant in their preferred language.

For Palmdale Station, all (100%) emails met the criteria for this objective because the complaint was accepted, and the Department initiated contact with the complainant in their preferred language.

Recommendations

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

Objective No. 2(c) – Department 800 Number

<u>Criteria</u>

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

A. **At all times**, LASD's telephone and internet systems allow for acceptance of personnel complaints via telephone, fax, and email.

Procedures

The auditors conducted mock complaint calls using the Department's 800 telephone number (800-698-TALK) in both English and Spanish. During these calls, the auditors remained anonymous and refrained from disclosing any information that would compromise the integrity of the test. These calls were made randomly over several days, including weekdays and weekends, and covered all three shifts: morning (AM), afternoon (PM), and evening (EM).

For the Spanish-language calls, the auditors assessed whether translation services were provided if the call-taker did not speak the same language as the caller. This was intended to ensure the complaint intake process was facilitated appropriately for Spanish speakers.

Additionally, the auditors reviewed the recordings in the NICE Inform system to confirm the calls were properly accepted. If a complaint call was not accepted or there were delays, the auditors checked the NICE Inform system for other calls, such as 9-1-1 emergency calls, to determine whether these had impacted the AV Stations' ability to respond to the auditors' complaint calls.

Findings

For the complaints made to the Department's 800 Number, six (75%) telephone calls met the criteria for this objective, as the call-taker accepted the complaint. The remaining two telephone calls (25%) did not meet the criteria because the call-taker did not facilitate the acceptance of the complaint.

Specifically:

SIB-2²³: The auditors conducted a mock telephone call in English to the Department's 800 Number during the AM Shift (0600-1400 hours), requesting to speak with someone who could accept a complaint. The desk personnel (call-taker) asked the caller for the location in which the incident occurred and placed the caller on hold. When the call-taker returned to the call, she provided the caller with Lancaster Stations' telephone number and advised the caller to ask for the Watch Sergeant or Watch Commander. The call-taker should have transferred the caller to a supervisor authorized to take a complaint within SIB.

SIB-5: The auditors conducted a mock telephone call in Spanish to the Department's 800 Number during the EM Shift (1000-0600 hours), requesting to speak with someone who could accept a complaint. The desk personnel transferred the caller to East Los Angeles Station. The call-taker should have transferred the caller to a supervisor authorized to take a complaint within SIB.

Recommendations

It is recommended the SIB establish a Unit Order outlining procedures for handling telephone complaints. This order should include guidelines for personnel, ensuring all calls are properly accepted, documented, and directed to the appropriate location.

Additionally, the auditors previously 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.

The AAB conducted a follow up of audit recommendations of the previous audit. The SIB responded that they are in the process of implementing corrective actions to address the recommendation by instituting a dedicated telephone line to receive public complaints. The implementation of the dedicated telephone line remains forthcoming.

²³ SIB refers to the Sheriff's Information Bureau. The number represents the sample being referred to of those reviewed for the Sheriff's Information Bureau.

Objective No. 2(d) – Complaint Calls Transferred to Supervisor without Unnecessary Delay

Criteria

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

B. Requests to make a personnel complaint are referred to a supervisor without unnecessary delay.

Procedures

The auditors conducted mock complaint calls using the public telephone number listed on each AV Station's website and determined whether requests to file a complaint were referred to a supervisor without unnecessary delay. These calls were made randomly in both English and Spanish over several days, including weekdays and weekends, and covered all three shifts: AM, PM, and EM.

During these calls, the auditors remained anonymous and refrained from disclosing any information that would compromise the integrity of the test. The auditors called the front desk, requested to file a personnel complaint, and waited to be transferred to a supervisor. If the auditor successfully connected with a supervisor, they asked for the supervisor's name, stated their intention to file a complaint against a deputy, and inquired whether the supervisor was willing to assist them. If the supervisor agreed to assist with the complaint over the phone, the auditor then provided an excuse to end the call. For the calls made in Spanish, the auditors also noted whether translation services were offered to facilitate the complaint intake process.

The auditors reviewed the recordings in the NICE Inform system to determine if the AV Stations referred the complaint to a supervisor without unnecessary delay. If there was a delay in handling a complaint, the auditors checked the NICE Inform system for other calls, such as 9-1-1 emergency calls, to determine whether these had impacted the AV Stations' ability to respond to the auditors' complaint calls.

Findings

For the AV Stations combined, 14 (86%) of the 16 telephone calls met the criteria for this objective, as the calls were transferred to a supervisor without unnecessary delay. The remaining two (14%) calls (both in Spanish) did not meet the criteria for this objective because the telephone calls were not transferred to a supervisor without unnecessary delay.

For Lancaster Station, seven (86%) of the eight telephone calls met the criteria for this objective because the calls were transferred to a supervisor without unnecessary delay. The remaining call (14%) did not meet the criteria for this objective because the telephone calls were not transferred to a supervisor without unnecessary delay.

For Palmdale Station, seven (86%) of the eight telephone calls met the criteria for this objective because the calls were transferred to a supervisor without unnecessary delay. The remaining call (14%) did not meet the criteria for this objective because the telephone calls were not transferred to a supervisor without unnecessary delay.

Specifically:

TCL-7²⁴: The auditors conducted a mock telephone call to Lancaster Station during the PM Shift (1400 – 2200 hours), spoke in Spanish and requested to speak with a supervisor who could take a complaint. The desk personnel used a translation service for the telephone call. The caller was transferred to the Watch Commander without unnecessary delay.

The Watch Commander was not available, and the caller was routed back to the front desk. The desk personnel answered the call and connected an interpreter for translation. The caller was informed that the Watch Commander was not available and was asked to call back in 10 to 15 minutes. To avoid unnecessary delay, the desk personnel should have asked the caller for their callback information to provide to the Watch Commander

TCP-6²⁵: The auditors conducted a mock telephone call to Palmdale Station during the AM Shift (0600 – 1400 hours), spoke in Spanish and requested to speak with a supervisor who could take a complaint. The desk personnel were able to speak to the caller in their preferred language without translation services. He informed the caller to go to the station and fill out the complaint form or go to the website to submit the complaint online. The caller was advised a supervisor would instruct him to do the same. To avoid unnecessary delay, the desk personnel should have transferred the caller to the Watch Commander who could take the complaint.

Recommendations

It is recommended supervisors hold desk personnel accountable for failing to transfer complaint-related calls to a supervisor. Additionally, desk personnel should be reminded to offer the caller the opportunity to provide their contact information when a supervisor is not available to take the complaint.

²⁴ TCL refers to telephone calls for Lancaster Station. The number represents the sample being referred to of those reviewed for Lancaster Station.

²⁵ TCP refers to telephone calls for Palmdale Station. The number represents the sample being referred to of those reviewed for Palmdale Station.

Objective No. 2(e) – AV Station Phones – Supervisor's Willingness to Accept Telephone Complaints

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaint Intake, Paragraphs 125 and 126 (October 2019), 3A states:

A. **At all times**, LASD's telephone and internet systems allow for acceptance of personnel complaints via telephone, fax, and email.

Procedures

The auditors conducted mock complaint calls using the public telephone number listed on each AV Station's website and determined whether requests to file a complaint were referred to a supervisor without unnecessary delay. These calls were made randomly in both English and Spanish over several days, including weekdays and weekends, and covered all three shifts: AM, PM, and EM.

During these calls, the auditors remained anonymous and refrained from disclosing any information that would compromise the integrity of the test. The auditors called the front desk, requested to file a personnel complaint, and waited to be transferred to a supervisor.

If the auditor successfully connected with a supervisor, they asked for the supervisor's name, stated their intention to file a complaint against a deputy, and inquired whether the supervisor was willing to assist them. If the supervisor agreed to assist with the complaint over the phone, the auditor then provided an excuse to end the call. For the calls made in Spanish, the auditors also noted whether translation services were offered to facilitate the complaint intake process.

The auditors reviewed the recordings in the NICE Inform system to verify whether the calls were accepted. If a complaint call was not accepted or experienced delays, the auditors checked the NICE Inform system for other calls, such as 9-1-1 emergency calls, to determine whether these impacted the AV Stations' ability to respond to the auditors' complaint calls.

Findings

For the AV Stations combined, all 14 (100%) telephone calls met the criteria for this objective because the supervisor was willing to accept the complaint.

For Lancaster Station, all seven (100%) telephone calls met the criteria for this objective because the supervisor was willing to accept the complaint.

For Palmdale Station, all seven (100%) telephone calls met the criteria for this objective because the supervisor was willing to accept the complaint.

Recommendations

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

Objective No. 3 - Initiation And Classification of Complaints

This objective evaluated whether an investigation was initiated for all public complaints and if the investigations were properly classified.

Objective No. 3(a) - Prompt Initiation of Complaint

Criteria

There is no specific compliance metric percentage for this objective; however, the Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Complaint Intake, Paragraph 125 and 126 (October 2019), Section 3B states:

- 3. LASD will be deemed in substantial outcomes compliance when: ...
 - B. Requests to make a personnel complaint are referred to a supervisor without unnecessary delay.

Additionally, the Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Management Oversight and Adjudication, Paragraph 130 (October 2019), states:

...LASD shall investigate every allegation of misconduct that arises during an investigation even if an allegation is not specifically articulated as such by the complainant.

Procedures

For the selected WCSCRs for each audit, the auditors reviewed intake interviews (audio and/or video) and related WCSCR investigation materials, such as emailed complaint forms, linked to the WCSCR investigations. The auditors analyzed audio and/or video recordings obtained from LASD. Evidence. com and the NICE Inform system to determine whether any delay in the initiation of the complaint resulted from Department actions. Specifically, the auditors compared the date and time the complainant made the allegation obtained from the intake interviews (audio and/or video) and the emailed complaint form to the date and time the information was documented on the WCSCR form.

Additionally, the auditors identified and reviewed all civil claims and lawsuits filed against AV Stations personnel during the audit time period to determine whether allegations of misconduct were made and whether a WCSCR investigation was subsequently initiated.

Findings

For the AV Stations combined, a total of 21 (95%) WCSCR investigative packets and civil claims/lawsuits met the criteria for this objective because a WCSCR was initiated for the allegations of misconduct without delay. A single civil claim (5%) did not meet the criteria for this objective because a WCSCR was not initiated for the alleged misconduct identified in the civil claim.

For Lancaster Station, all seven (100%) WCSCR investigative packets met the criteria for this objective because a WCSCR was initiated for the complaints of misconduct without delay. There were no civil claims or lawsuits.

For Palmdale Station, a total of 11 (93%) WCSCR investigative packets and two lawsuits met the criteria for this objective because a WCSCR was initiated for the complaints of misconduct without delay. The one civil claim (7%) did not meet the criteria for this objective because a WCSCR was not initiated for the alleged misconduct identified in the civil claim.

Specifically:

CCP-1²⁶: The claimant alleged his backpack was not returned to him after he was released from Palmdale Station's custody. The claimant also alleged the deputies placed his backpack in the trunk of their patrol vehicle when they arrested him for "no reason." The Department misplaced the backpack, resulting in its loss and failure to safeguard the claimant's property. The auditors determined a WCSCR should have been initiated for the alleged misconduct identified in the civil claim.

Recommendations

The auditors previously 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. The AAB conducted a follow up of audit recommendations. As of May 2025, the AV Stations have implemented procedures to ensure all complaints made are addressed and a WCSCR is initiated.

²⁶ CCP refers to civil claims for Palmdale Station. The number represents the sample being referred to of those reviewed for Palmdale Station.

Objective No. 3(b) - Discouraging or Inhibiting a Complaint

<u>Criteria</u>

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

- 3. LASD will be deemed in substantial outcomes compliance when: ...
 - F. In 95% of cases when an employee is found to have refused to accept a personnel complaint, discouraged the filing of a complaint, or provided false or misleading information about filing a complaint, appropriate corrective action is taken, to potentially include discipline up to and including termination.

Procedures

For the selected WCSCRs in each audit, the auditors reviewed intake interviews (audio and/or video), including BWC recordings and recorded telephonic conversations obtained from LASD.Evidence.com, to determine whether an employee refused to accept a complaint, discouraged a complainant from filing a complaint, or provided false or misleading information about the complaint filing process.

Findings

For the AV Stations combined, all 18 (100%) met the criteria for this objective because the auditors determined there was no evidence AV Station personnel refused or discouraged complainants from filing a complaint.

For Lancaster Station, all seven (100%) met the criteria for this objective because the auditors determined there was no evidence Lancaster Station personnel refused or discouraged complainants from filing a complaint.

For Palmdale Station, all 11 (100%) met the criteria for this objective because the auditors determined there was no evidence Palmdale Station personnel refused or discouraged complainants from filing a complaint.

Recommendations

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

Objective No. 3(c) – Watch Commander Initiates a WCSCR or Provides Justification in Watch Commander's Log

Criteria

There is no specific compliance metric percentage for this objective; however, the Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Complaint Intake, Paragraph 126 (October 2019), Section 3E states:

- 3. LASD will be deemed in substantial outcomes compliance when: ...
 - E. A supervisor who determines a public complaint does not constitute a personnel or service complaint records the complaint and rationale for that decision either in a supervisor's report or entry in the Watch Commander's log.

Procedures

For the selected audit period, the auditors reviewed one week of telephone calls from the Watch Commander lines that were recorded in the NICE Inform system to determine whether a supervisor should have initiated a complaint or provided a suitable justification in the WCL in the SBAP explaining why a WCSCR investigation was not necessary.

The auditors reviewed entries made in the WCL labeled as "Non-Complaint" Incidents and attempted to verify the documented entry information against its corresponding phone calls or BWC recordings.

The auditors reviewed a total of 173 calls from the Watch Commander line for the AV Stations combined during the audit period of March 9, 2025, through March 15, 2025. Of these calls, 57 were for Lancaster Station and 116 for Palmdale Station.

For Lancaster Station, seven of the 57 calls required a WCSCR investigation or documentation of a suitable justification in the WCL for not initiating a complaint. As a result, these seven were evaluated for this objective.

For Palmdale Station, four of the 116 calls required a WCSCR investigation or documentation of a suitable justification in the WCL for not initiating a complaint. As a result, these four were evaluated for this objective.

Additionally, the auditors reviewed a total of 151 entries made in the WCL from March 9, 2025, through March 15, 2025, for the AV Stations combined. Of these entries, 36 were for Lancaster Station and 115 for Palmdale Station. The auditors identified no entries for "Non-Complaint" Incidents in which a complaint was made.

Findings

For the AV Stations combined, five (45%) of the 11 met the criteria for this objective because AV Station supervisors initiated a WCSCR investigation when they were made aware of an allegation. The remaining six (55%) did not meet the criteria for this objective because Station supervisors did not initiate a WCSCR investigation when they were made aware of an allegation or failed to document a suitable justification in the Watch Commander Log for not initiating a WCSCR.

For Lancaster Station, three (43%) of the seven met the criteria for this objective because Station supervisors initiated a WCSCR investigation when they were made aware of an allegation. The remaining four (57%) did not meet the criteria for this objective because Station supervisors did not initiate a WCSCR investigation when they were made aware of an allegation or failed to document a suitable justification in the Watch Commander Log for not initiating a WCSCR.

For Palmdale Station, two (50%) of the four met the criteria for this objective because Station supervisors initiated a WCSCR investigation when they were made aware of an allegation. The remaining two (50%) did not meet the criteria for this objective because Station supervisors did not initiate a WCSCR investigation when they were made aware of an allegation or failed to document a suitable justification in the Watch Commander Log for not initiating a WCSCR.

Specifically:

WCL-2: The complainant alleged a deputy, driving without lights or sirens, nearly ran her off the road. She immediately called the station following the incident and provided both the license plate number and SH vehicle number.

The Watch Commander informed the complainant of an active investigation in her area. The complainant offered information she believed could assist with the investigation, including the subject's whereabouts. The Watch Commander also attempted to identify the vehicle's assigned to deputies by checking station records but was unsuccessful. Per PRMS, a WCSCR investigation was not initiated, and no entry was made in the WCL documenting a suitable justification for not initiating a WCSCR.

WCL-3: The complainant alleged that he filed a report with Palmdale Station regarding an incident in which he was drugged, beaten, and assaulted in Las Vegas, then forcibly taken to Palmdale against his will. The complainant maintained contact with Palmdale Station for the past eight months and asserts the report number he was given has disappeared from the system. He further stated, Palmdale Station personnel informed him there is no incident report, and that no crime was committed for the incident described.

The Watch Commander checked the Regional Allocation of Police Services²⁷ (RAPSNET) for the call for service and contacted Department members at Palmdale Station for additional information regarding the complainant's previous conversations. Additionally, the Watch Commander asked the complainant to come to the station for deputies to take an incident report. Per PRMS, a WCSCR investigation was not initiated, and no entry was made in the WCL documenting a suitable justification for not initiating a WCSCR.

WCL-5: The first complainant alleged she called the station over several days requesting to have deputies respond to her call for service, to press charges against her son's ex-girlfriend. On the same telephone call, a second complainant (son) alleged he went to the station to request deputies' assistance in retrieving his personal items from his ex-girlfriend's residence and was told he had to wait as Department members were handling a shooting incident. The complainant said he waited at the station for approximately six hours and did not receive any assistance. He later called the station, was repeatedly placed on hold, and was eventually told to wait an additional two hours.

The second complainant alleged that on March 9, 2025, deputies responded to his location and asked for consent to search his vehicle. He stated he told deputies "no," but they still conducted the search.

The Watch Commander checked the RAPSNET for the call for service and informed the second complainant of laws pertaining to vehicle searches. Additionally, the Watch Commander entered a new call for service for the second complainant to retrieve his property. Per PRMS, a WCSCR investigation was not initiated, and no entry was made in the WCL documenting a suitable justification for not initiating a WCSCR for both allegations.

WCL-7: The complainant alleged he had been harassed and followed by deputies several times over the past year. On August 2024 the complainant was arrested by a deputy. The same deputy who made the arrest issued the complainant a ticket in March 2024 and told him he would be arrested for firearm possession regardless of whether it was in a locked safe. He added that there are other incidents in which he was followed to his mother's house and other locations, despite being in a different car. Additionally, he alleged the ticket related to the incident in March 2024 does not show in the traffic system for him to pay, despite him having proof of being stopped.

The complainant tried calling the station several times regarding the incidents but was unable to speak with the Watch Commander and felt he was getting the runaround. Due to the multiple encounters with deputies, the complainant said he was afraid to go to the station to file the complaint.

²⁷ The RAPSNET application is an online system containing information that forms the official record of the Sheriff's Department's patrol unit activities generated from the Computer-Aided Dispatch (CAD) system.

The Watch Commander gathered additional information from the complainant regarding the incidents and informed him to contact the Detective Bureau's supervisor at Lancaster Station for details pertaining to his ongoing investigation and case. Per PRMS, a WCSCR investigation was not initiated, and no entry was made in the WCL documenting a suitable justification for not initiating a WCSCR.

WCP-2: The complainant alleged the detectives who filed a domestic violence²⁸ report the previous week were unprofessional and discourteous. She informed the detectives she did not wish to press charges, stating that doing so would put her in greater danger. She also requested that detectives refrain from contacting her parents about the incident; however, her mother was still called. Additionally, she alleged detectives yelled at her to obtain information related to the incident.

The Watch Commander checked the RAPSNET for the call for service and informed the complainant of the Department's policy regarding the investigation of domestic violence reports. He also collected the complainant's contact information to forward to the station's Detective Bureau's supervisor for further follow-up and to address all the complainant's concerns. Per PRMS, a WCSCR investigation was not initiated, and no entry was made in the WCL documenting a suitable justification for not initiating a WCSCR.

WCP-3: The complainant alleged the deputy who wrote her incident report failed to document accurate information and included statements that she did not make. She stated there are significant inconsistencies within the report that require correction but did not provide specific details.

The Watch Commander advised the complainant to come into the station to have a Department member complete a supplemental incident report. Per PRMS, a WCSCR investigation was not initiated, and no entry was made in the WCL documenting a suitable justification for not initiating a WCSCR.

Recommendations

It is recommended the AV Stations' command staff conduct weekly audits of WCL entries and telephone calls received through the Watch Commander's telephone line to ensure personnel 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.

²⁸ Domestic violence means abuse committed against an adult or a minor who is a spouse, former spouse, cohabitant, former cohabitant, or a person with whom the suspect has had a child or is having or has had a dating or engagement relationship.

Objective No. 3(d) – Field Supervisor's Documentation of Contacts That Did Not Constitute a Complaint

Criteria

There is no applicable AV Compliance Metric percentage for this objective; however, the Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Complaint Intake, Paragraphs 125 and 126 (October 2019), Section 3C and 3E states:

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

Palmdale Station Unit Order, 14-06, Supplemental Supervisory Responsibilities, Section – Non-Complaint Incidents, states:

If a supervisor is requested in the field (or is otherwise contacted via phone or in person) by a community member regarding a potential complaint and it is determined a Service Comment Form will not be generated, the supervisor who responded shall ensure an entry is made in the CAD system. The responding supervisor shall create an "obs" in the CAD (MDC or Station Dispatch). The entry shall be coded as 924 with the location of the incident or station address. The log clearance should be coded 777" with a narrative starting with - "Non-Complaint Incident," and shall describe the incident details, associated Incident Tag/URN, and outcome. Supervisors shall refer to the SCR Handbook and the appropriate MPP sections for guidance on handling community complaints.

All allegations of potential misconduct shall be documented on a SCR form.

Procedures

For the selected audit period, the auditors reviewed the entries made by supervisors of the AV Stations in the MDC with clearance code 777 (assist citizen). These entries may document interactions with members of the public concerning allegations that were not classified as complaints. The auditors reviewed whether the supervisors provided appropriate justifications in their entries when a member of the public attempted to initiate a complaint, however, it was concluded no WCSCR investigation was necessary. Additionally, the auditors reviewed the BWC recordings from the on-scene sergeant or lieutenant for all incidents associated with complaints analyzed in Objective 3(a).

This review determined whether the complaint was initiated promptly and appropriately, or if the justification for not initiating a WCSCR investigation was adequately documented in the MDC log. Furthermore, the auditors compared the MDC entry against its corresponding BWC recordings to verify the information documented in the MDC accurately reflected what was depicted in the BWC recording.

Findings

During the audit period, there was one incident in which a field supervisor used clearance code 777; however, the auditors determined the incident was not a complaint. The Palmdale Station field supervisor was flagged down by a civilian to assist a member of the public suffering from diabetic shock inside of a vehicle.

Additionally, out of the 16 WCSCR investigative packets reviewed, the auditors determined a field supervisor was not present at 15 of the incidents. Of the remaining one incident, auditors observed the BWC of the field supervisor present at the incident, however the community member did not request to speak to the supervisor and did not observe any requests to make a complaint. It is unknown why the field supervisor was present at the stop.

Recommendations

There are no recommendations because the compliance rate is "NIN", as no incidents pertained to the criteria.

Objective No. 3(e) - Service Versus Personnel Complaints

<u>Criteria</u>

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

- 3. LASD will be deemed in substantial outcomes compliance when: ...
 - B. **At least 95%** of public complaints are classified properly as a service and/or personnel complaint at intake, resolution, and adjudication, or corrected during the management review.

Procedures

For the selected WCSCRs in each audit, the auditors reviewed the WCSCR investigative packets, as well as the related audio and/or video files obtained from LASD. Evidence.com. The goal was to determine whether these investigations were properly categorized as personnel and/or service complaints during intake, resolution, and adjudication or if any corrections were made during the management review process. The SCR Handbook classifies complaints in the following way:

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

Findings

For the AV Stations combined, 15 (94%) of the 16 WCSCR investigations met the criteria for this objective because the investigations were correctly categorized as personnel and/or service complaints. The remaining one (6%) WCSCR investigation did not meet the criteria because the investigation was not correctly categorized as a personnel and service complaint.

For Lancaster Station, all seven (100%) WCSCR investigations met the criteria for this objective because the investigations were correctly categorized as personnel and/or service complaints.

For Palmdale Station, eight (88%) of the 9 WCSCR investigations met the criteria for this objective because the investigations were correctly categorized as personnel and/or service complaints. The remaining one (12%) WCSCR investigation did not meet the criteria because the investigation was not correctly categorized as a personnel and service complaint.

Specifically:

P-6²⁹: The WCSCR investigation was appropriately classified as a Personnel and Service Complaint. However, the Result of Service Comment Review form was not marked to include the Service Complaint category. A modification log should have been completed to address the Service Complaint.

Recommendations

It is recommended the AV Stations' Operations staff carefully review all relevant information, including all BWC recordings, to ensure each allegation is identified and properly classified.

²⁹ P refers to Palmdale Station. The number represents the sample being referred to of the 16 WCSCR investigations reviewed for Palmdale Station.

CONCLUSION

Overall, the AAB found the AV Stations demonstrated commendable adherence to many aspects of the Agreement, with particularly strong compliance in areas such as the availability of complaint information on the Department and station websites, the handling of email and mail-in complaints, and the willingness of supervisors to accept complaints. However, the auditors identified key areas requiring improvement. These included the inconsistent availability of English and Spanish complaint materials at designated facilities, deficiencies in timely complaint call transfers, and most notably, failures by the Watch Commander to consistently initiate WCSCRs or provide documented justification for not doing so.

These findings underscore the need for strengthened oversight, consistent application of complaint intake protocols, and enhanced accountability measures. The AAB has provided recommendations to address these deficiencies and support continuous improvement across the AV Stations.

SUMMARY OF RECOMMENDATIONS

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

Objective No. 1 – Availability of Complaint Information

a) Specified Facilities: It is recommended the Watch Commander for each shift conduct daily inspections of the complaint materials on a weekly basis to ensure required materials are available and displayed in both English and Spanish. The inspection should be documented in the WCL and include the date and time of inspection, name of inspecting personnel, status of materials (available, missing, damaged, etc.) and any corrective actions taken, if applicable.

Additionally, the complaint materials should be encased or posted in tamperresistant displays to protect against damage, removal, or tampering. This will ensure continuous availability and maintain the integrity of the information, especially when the station is waiting to receive an order for materials.

Objective No. 2 – Acceptance of Complaint Information

- c) Department 800 Number: It is recommended the SIB establish a Unit Order outlining procedures for handling telephone complaints. This order should include guidelines for personnel, ensuring all calls are properly accepted, documented, and directed to the appropriate location.
 - Additionally, the auditors previously 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.
 - The AAB conducted a follow up of audit recommendations. The SIB responded that they are in the process of implementing corrective actions to address the recommendation by instituting a dedicated telephone line to receive public complaints. The implementation is forthcoming.
- d) Complaint Calls Transferred to Supervisor without Unnecessary Delay: It is recommended supervisors hold desk personnel accountable for failing to transfer complaint-related calls to a supervisor. Additionally, desk personnel should offer the caller the opportunity to provide their contact information when a supervisor is not available to take the complaint.

Objective No. 3 – Initiation and Classification of Complaints

- a) Prompt Initiation of Complaint: It is recommended the AV Stations document the review and decision-making process of all allegations of misconduct, regardless of the sources, including civil claims and lawsuits, in the WCL. Each entry should include reasons for initiating or not initiating a WCSCR and be subject to periodic management oversight.
- c) Watch Commander Initiate a WCSCR or Provide Justification in the Watch Commander Log: It is recommended the AV Stations' command staff conduct weekly audits of WCL entries and telephone calls received through the Watch Commander's telephone line to ensure the AV Stations' personnel 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.
- e) Service Versus Personnel Complaints: It is recommended the AV Stations' Operations staff carefully review all relevant information, including all BWC videos, to ensure each allegation is identified and properly classified.

FOLLOW-UP PROCEDURES

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

DEPARTMENT APPLICAIONS

- LASD.Evidence.com
- Mobile Digital Computer (MDC)
- NICE Inform
- Performance Recording and Monitoring System (PRMS), Service Comment Module
- Scheduling Management System (SMS)
- Station/Bureau Administration Portal (SBAP) Risk Management Tracker

REFERENCES

- United States Department of Justice Los Angeles County Sheriff's Department Antelope Valley Settlement Agreement, Case Number CV 15- 03174 (April 2015)
- Antelope Valley Settlement Agreement Compliance Metrics (October 2019)
- Antelope Valley Monitoring Team Monitor's Second Audit of Community Complaints (December 2020)
- Manual of Policy and Procedures Section:
 - o 3-04/010.25, Personnel Complaints (October 2014)
- Proposed Draft Service Comment Report Handbook (August 2022)

Views of Responsible Officials

On May 16, 2025, Lancaster Station command staff submitted a response concurring with the findings. On May 13, 2025, Palmdale Station command staff submitted a response concurring with the findings. The AAB presented the final audit report to the Division Director, Office of Constitutional Policing.

10/29/2025

GEOFFREY N. CHADWICK

DATE

Captain

Audit and Accountability Bureau

Los Angeles County Sheriff's Department