ROBERT G. LUNA, SHERIFF

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

Part II of Public Complaints Audit:

Investigation of Public Complaints
Antelope Valley Stations
Project No. 2025-2-A

Prepared By:

Audit and Accountability Bureau

2025

Los Angeles County Sheriff's Department
Audit and Accountability Bureau

Part II of Public Complaints Audit:
Investigation of Public Complaints
Antelope Valley Stations
Project No. 2025–2–A

AUDIT REPORT

PURPOSE

The Audit and Accountability Bureau (AAB) conducted the Public Complaints Audits 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 Agreement (Agreement).[1] The purpose of Part II audits (2025-2-A, 2025-12-A, and 2025-25-A) was to determine whether the investigation of public complaints complied with the Agreement. Specifically, the audit assessed whether Lancaster and Palmdale Stations (AV Stations) complied with paragraphs 131, 133 through 137, 140, and 149 of the Agreement.

As mandated by the Agreement, the primary objectives of the audit were to ensure whether the AV Station supervisors conducted thorough investigations, leading to reliable and well-supported conclusions. 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 from 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 compliance[2] and assessed whether the Department met its obligations under the Agreement.

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.*

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

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

Additionally, Paragraph 149 of the Agreement states:

> *The Monitor shall… determine whether LASD has implemented and continues to comply with the material[3] 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 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.

<u>Project Numbers, Due Dates, and Population Time Periods</u>

Project No.	Projected Due Date	Population Time Period
2025–2–A	April 2025	July 1, 2024, through July 31, 2024
2025–12–A	December 2025	TBD

The AAB conducted this audit under the guidance of Generally Accepted Government Auditing Standards (GAGAS)[4]. The AAB determined whether the evidence obtained was sufficient and appropriate to provide a reasonable basis for the findings based on the audit objectives.

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

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 investigation of public complaints. The AAB carefully developed the audit objectives, scope, and methodology, focusing on the Agreement and the established compliance metrics. The Department's compliance was measured against the compliance metrics, along with additional direction provided by the MT to ensure the 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 No. 3 – Initiation and Classification of Complaints for Part I of the Public Complaints Audit, used the same audit population.

The auditors identified the investigations for the audit period in the Performance Recording and Monitoring System (PRMS),[5] and reconciled the data with the Report Navigator[6] to ensure the population selected was accurately accounted for.

The auditors evaluated completed[7] investigations. This allowed for the evaluation of the effectiveness of the management review process. The population consisted of all Watch Commander's Service Comment Report (WCSCR) investigations initiated from July 1, 2024, through July 31, 2024.

Lancaster Station had a total of 15 WCSCR investigations in PRMS. However, of the 15 investigations, 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 and 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) was subsequently voided. The remaining seven investigations were reviewed for this audit.

Palmdale Station had a total of 16 WCSCR investigations in PRMS. Of these, four were commendations and one was previously 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 and Oversight of Public Complaints (Project No. 2024-58-A). Three investigations, initially classified as WCSCRs, were later reclassified as Administrative Investigations. Of the reclassified investigations, only one had a Service Comment Review completed prior to becoming an Administrative Investigation which was analyzed by the auditors. As a result, nine investigations were reviewed for the objectives in this audit.

The identified Administrative Investigations were subsequently evaluated in a separate supplemental review report (*Supplemental Review of PART II and III of Public Complaints Audits*), which confirmed compliance with the Department policy and the Agreement.

Note: Administrative Investigations are more complex than SCRs and, therefore, require more time to complete. Rather than hold up the SCR portion of this audit, SA compliance for the Administrative Investigations will be addressed in a supplemental report.

[5] The PRMS is a web-based application that systematically records data relevant to incidents involving uses of force, shootings, and commendations/complaints regarding Sheriff's Department personnel. In addition, PRMS tracks the progress of administrative investigations, civil claims and lawsuits, discovery motions, employee commendations, preventable traffic collisions, custody complaints, and special conditions that the Department handles.
[6] Report navigator is a database used by the Department to identify current and overdue complaint investigations.
[7] Completed refers to the approval of investigations at the North Patrol Division (NPD) level.

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

Audit Project No.	WCSCR Investigations Initiated		WCSCR Investigations Audited	
	Lancaster	Palmdale	Lancaster	Palmdale
2025–2–A	15	16	7	9
2025–12–A	TBD	TBD	TBD	TBD

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.

Audit Procedures

The auditors reviewed the compliance metrics related to public complaints and examined the AV Stations' processes, materials, and documents, including logs, the WCSCR, the Result of Service Comment Review form(s), associated memoranda, correspondence, reports, dispatch calls, audio and all associated BWC recordings for the audit population, photographs, or other related documents. The auditors provided a detailed summary of procedures and audit findings within each objective.

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 papers[8], 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.

[8]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.

Summary of Findings

This audit consisted of one main objective with a total of 11 sub-objectives. The AV Stations were evaluated separately for each sub-objective. The results were combined to assess whether they met the established compliance metrics.

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	**INVESTIGATION OF COMPLAINTS**				
1(a)	*Identify Everyone at the Scene*	100%	89%	94%	85%
1(b)	*Interviews Conducted Separately*	100%	100%	100%	85%
1(c)	*Interview Complainant in-Person*	86%	89%	88%	85%
1(d)	*Witness Interview Requirements*	100%	100%	100%	85%
1(e)	*Additional Interviews Conducted as Needed*	100%	100%	100%	85%
1(f)	*Limited English Proficiency (LEP)*	NIN[9]	NIN	NIN	85%
1(g)	*Material Inconsistency Identified and Explained When Possible*	100%	100%	100%	85%
1(h)	*Record Entire Interviews*	86%	100%	94%	92%
1(i)	*Uninvolved Investigator*	100%	100%	100%	90%
1(j)	*Collect All Evidence*	86%	100%	94%	95%
1(k)	*Reliability of the Investigation*	86%	100%	94%	92%

[9] 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 – Investigation of Public Complaints

This objective evaluated whether the investigations of public complaints were conducted thoroughly to ensure reliable and well-supported conclusions.

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

Criteria

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

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

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

      5. *Personnel complaint investigators:*

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

Procedures

The auditors reviewed the Reporting Party (R/P), Involved Employee, and Civilian and Employee Witness information sections of the WCSCR and the Service Comment Review for each investigation. The auditors compared this information with the corresponding BWC recordings, audio recordings, crime and/or arrest reports and images, as well as the narrative portion of the Service Comment Review to ensure all individuals present at the scene of the incident were identified.

If any individual present at the scene was not identified, the auditors determined whether a detailed justification was documented in the Service Comment Review explaining why that individual was not identified.

Additionally, the auditors verified whether investigators identified all Department members and witnesses who were present at the scene but claimed they neither witnessed nor were involved in the incident. If these assertions appeared unsupported by the evidence, the auditors evaluated whether the investigator conducted further inquiry into the matter.

Findings

For the AV Stations combined, 15 (94%) of the 16 WCSCR investigations met the criteria for this objective because everyone at the scene was identified. The remaining one (6%) WCSCR investigations did not meet the criteria for this objective because not everyone at the scene was identified.

For Lancaster Station, seven (100%) of the seven WCSCR investigations met the criteria for this objective because all individuals at the scene were identified.

For Palmdale Station, eight (89%) of the nine WCSCR investigations met the criteria for this objective because all individuals at the scene were identified. The remaining one (11%) WCSCR investigation did not meet the criteria for this objective because not everyone at the scene was identified.

Specifically:

P-1[10]: During a call for service, the R/P alleged the Department members did not properly address her request. The R/P also alleged the Watch Commander (WC) was discourteous. The BWC recordings showed two juveniles, who were the R/P's children, were present at the scene during the time the complaint incident took place and participated in the interview process while the R/P was being interviewed. These juveniles should have been listed as witnesses on the witness information section of the WCSCR and Service Comment Review.

Recommendations

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

[10] P refers to Palmdale Station. The number represents the sample being referred to for the WCSCR investigations reviewed by Palmdale Station.

Objective No. 1(b) – Interviews Conducted Separately

Criteria

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

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

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

      1. *All interviews are conducted separately.*

Procedures

The auditors reviewed the interview recordings of the complainant and civilian witnesses for each investigation and assessed whether any other involved individuals, including Department member witnesses, were present during these interviews. Additionally, the auditors reviewed the statements from the Department members and Department member witnesses involved, as documented in each investigation's corresponding Service Comment Review.

The auditors verified whether the investigator documented all interviews were conducted separately. In cases where an interview was not conducted separately, the auditors determined whether a detailed justification was documented in the Service Comment Review. This justification was required to include the name of the individual present and the reason for their presence during the interview.

Findings

For the AV Stations combined, 16 (100%) of the 16 WCSCR investigations met the criteria for this objective because all interviews were conducted separately.

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

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

Recommendations

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

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

Criteria

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

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

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

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

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

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

Procedures

The auditors reviewed all the complainant interview recordings to determine whether each interview was conducted in-person. The auditors also reviewed the corresponding Service Comment Review to determine whether the investigator documented an in-person interview was conducted, when feasible, or provided justification, if it was not practical.

Findings

For the AV Stations combined, 14 (88%) of the 16 WCSCR investigations met the criteria for this objective because the complainants were interviewed in-person. The remaining two (12%) WCSCR investigations did not meet the criteria for this objective because the complainants were not interviewed in-person or not interviewed at all.

For Lancaster Station, six (86%) of the seven WCSCR investigations met the criteria for this objective because the complainant was interviewed in-person. The remaining one (14%) WCSCR investigation did not meet the criteria for this objective.

For Palmdale Station, eight (89%) of the nine WCSCR investigations met the criteria for this objective because the complainant was interviewed in-person. The remaining one (11%) WCSCR investigation did not meet the criteria for this objective.

Specifically:

L-5[11]: During two calls for service regarding a medical emergency and an incident with a drug dealer, the R/P alleged the Department members repeatedly hung up on her and did not take her call seriously. The R/P also alleged the WC was rude and dismissive when she spoke to her at the station to report the drug dealer.

The investigator did not conduct an in-person interview with the R/P and relied solely on the R/P's submitted written complaint form. The investigator documented in the Service Comment Review that, based on his review of the 911 audio recordings, there were communication issues with the R/P's telephone. However, the investigator did not attempt to contact the R/P for an in-person interview, nor did he document any attempts to do so or provide sufficient justification to support why he was unable to conduct an in-person interview.

P-6: During a call for service in which the R/P sought advice on how to handle false allegations made against her daughter and prevent further escalation. The R/P alleged the Department member repeatedly placed her on hold, hung up on her, and provided wrong advice. The investigator interviewed the R/P via telephone but did not document in the Service Comment Review the reason an in-person interview was not conducted.

<u>Recommendations</u>

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

[11] L refers to Lancaster Station. The number represents the sample being referred to for the WCSCR investigations reviewed by Palmdale Station.

Objective No. 1(d) – Witness Interview Requirements

Criteria

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

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

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

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

Per the MT, the criteria may also be met if a witness' role in the complaint was not materially impactful and the BWC recording sufficiently captured the incident.

Procedures

The auditors reviewed all documentation in the completed packets, including incident reports, supplemental reports, and booking packets. Additionally, the auditors reviewed all available BWC and audio recordings, as well as interviews with the complainant and civilian witnesses. Furthermore, the auditors reviewed statements from both the Department members and Department member witnesses involved.

The auditors verified whether written statements or interview recordings were available for all Department and non-Department witnesses who played a significant role in the complaint. For witnesses with a minor role, the auditors verified whether a written statement, an interview recording, or a detailed justification for why a statement or interview was not required was documented in the Service Comment Review. In addition, auditors determined if BWC recordings captured sufficient information to determine the necessity of interviewing additional witnesses.

Findings

For the AV Stations combined, all 16 (100%) WCSCR investigations met the criteria for this objective because all material witnesses were interviewed.

For Lancaster Station, all seven (100%) WCSCR investigations met the criteria for this objective because all material witnesses were interviewed.

For Palmdale Station, all nine (100%) WCSCR investigations met the criteria for this objective because all material witnesses were interviewed.

Recommendations

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

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

Criteria

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

> 3. *LASD will be deemed in substantial outcomes compliance when it:*
>
>   B. *At least 85% of AV's public personnel complaint investigations meet the investigative requirements identified in the SA. This will involve a qualitative and quantitative evaluation of the following SA requirements:*
>
>   3. *Investigators conduct additional interviews as necessary to reach reliable and complete findings.*

Per the MT, the criteria may also be met if no additional interviews were required, as this would demonstrate a thorough investigation was completed. The MT also stated if a person, other than the complainant, was not interviewed, but the investigation was sufficient to reach reliable and complete findings, additional interviews are not required for compliance.

Procedures

The auditors reviewed all documentation in the completed investigation packets, including incident reports, supplemental reports, and booking packets to determine whether it was documented that additional interviews were required and conducted. Additionally, the auditors reviewed all available BWC and audio recordings, as well as interviews conducted with the complainant and civilian witnesses. Furthermore, the auditors reviewed statements from the involved Department members and Department member witnesses involved to evaluate whether further interviews were conducted to gather the necessary information for reliable and comprehensive findings.

Findings

For the AV Stations combined, all 16 (100%) WCSCR investigations met the criteria for this objective because all additional necessary interviews were conducted.

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

For Palmdale Station, all nine (100%) WCSCR investigations met the criteria for this objective because all necessary interviews were conducted.

Recommendations

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

Objective No. 1(f) – Limited English Proficiency (LEP)

Criteria

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

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

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

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

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

Procedures

The auditors reviewed recordings of complainants and the civilian witness interviews to determine if any of the complainants or witnesses required an interpreter. If so, the auditors determined whether an uninvolved interpreter, in the underlying complaint, was utilized to obtain a statement or conduct interviews with all LEP complainants and material witnesses.

For LEP witnesses, the auditors determined whether any Department members involved in the complaint were used as interpreters and whether detailed justification was documented in the Service Comment Review explaining why the Department members involved with the complaint were utilized.

Findings

For the AV Stations combined, the compliance rate is "NIN", because there were no incidents that required an interpreter. Therefore, the criteria did not apply to this objective.

An interpreter was not required by any of the complainants or witnesses for any of the AV Stations' 16 WCSCR investigations reviewed.

Recommendations

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

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

<u>Criteria</u>

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

> 3. *LASD will be deemed in substantial outcomes compliance when it:*
>
>   B. *At least 85% of AV's public personnel complaint investigations meet the investigative requirements identified in the SA. This will involve a qualitative and quantitative evaluation of the following SA requirements:*
>
>   9. *When a personnel complaint investigation contains material inconsistencies between witness statements, efforts to resolve those inconsistencies are documented.*

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

Additionally, the criteria is also met if material inconsistencies are not apparent, as this demonstrates a thorough investigation was completed.

<u>Procedures</u>

The auditors reviewed all documentation in the completed investigation packets, including incident reports, supplemental reports, and booking packets. Additionally, the auditors reviewed all available BWC and audio recordings and interviews with the complainant and civilian witnesses. Furthermore, the auditors reviewed the statements of the Department members and involved Department member witnesses. The auditors noted any instances when an investigation contained material inconsistencies between the complainant, involved Department members, and/or witness statements, and differences between the BWC and audio recordings and investigative documentation. Additionally, the auditors documented whether efforts to resolve those inconsistencies were documented in the Service Comment Review.

Findings

For the AV Stations combined, all 16 (100%) WCSCR investigations met the criteria for this objective because no material inconsistencies were identified.

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

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

Recommendations

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

Objective No. 1(h) – Record Entire Interviews

Criteria

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

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

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

Procedures

The auditors reviewed the recordings of the complainant interviews to verify whether each interview was recorded in its entirety. For any interviews that were not recorded entirely, the auditors reviewed the Service Comment Review to determine whether the investigator documented the reasons for the incomplete recording of the complainant's interview.

Findings

For the AV Stations combined, 15 (94%) of the 16 WCSCR investigations met the criteria for this objective because all complainant interviews were recorded in their entirety.

For Lancaster Station, six (86%) of the seven WCSCR investigations met the criteria for this objective because all complainant interviews were recorded in their entirety. The remaining one (14%) WCSCR investigations did not meet the criteria because the complainant interview was not recorded.

For Palmdale Station, all nine (100%) WCSCR investigations met the criteria for this objective because all complainant interviews were recorded in their entirety.

Specifically:

L-6: The investigator stated the R/P interview was not recorded but did not document in the Service Comment Review the reason why the interview was not recorded.

Recommendations

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

Objective No. 1(i) – Uninvolved Investigator

Criteria

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

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

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

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

Procedures

The auditors reviewed all documentation in the completed investigation packets, including incident reports, supplemental reports, and booking packets. Additionally, the auditors reviewed all available BWC and audio recordings, and interviews with the complainant and civilian witnesses. Furthermore, the auditors reviewed the statements of the Department members and Department member witnesses involved.

The auditors also verified whether the supervisor conducting the investigation was uninvolved in the incident. If the supervisor was involved, the auditors determined whether the supervisor authorized the conduct that led to the complaint and whether a justification was documented in the Service Comment Review, justifying the supervisor conducting the investigation.

In cases involving serious misconduct allegations, the auditors verified that an uninvolved supervisor conducted the investigation or whether sufficient justification for a minimally involved supervisor was documented, as required by the MT.

Findings

For the AV Stations combined, all 16 (100%) WCSCR investigations met the criteria for this objective because the investigating supervisor was not involved in the incident.

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

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

Recommendations

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

Objective No. 1(j) – Collect All Evidence

Criteria

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

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

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

Procedures

The auditors reviewed all documentation in the completed investigation packets, including incident reports, supplemental reports, and booking packets. Additionally, the auditors reviewed all available BWC and audio recordings, and interviews with the complainant and civilian witnesses. Furthermore, the auditors reviewed statements from the involved Department members and Department member witnesses and verified whether all relevant evidence was considered to support each determination made.

Findings

For the AV Stations combined, 15 (94%) of the 16 WCSCR investigations met the criteria for this objective because all relevant evidence was considered, and credibility determinations were made based upon that evidence. The remaining one (6%) WCSCR investigation did not meet the criteria for this objective because all relevant evidence was not considered, and credibility determinations were not made based upon evidence.

For Lancaster Station, six (86%) of the seven WCSCR investigations met the criteria for this objective because all relevant evidence was considered, and credibility determinations were made based upon that evidence. The remaining one (14%) WCSCR investigation did not meet the criteria because all relevant evidence was not considered, and credibility determinations were not made based upon that evidence.

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

Specifically:

L-5: As noted under Objective No. 1(c) – Interview Complainant in-Person, the investigator relied solely on the R/P's written complaint form. The investigator did not gather all necessary evidence to investigate the R/P's allegations against the Department members and the WC. The auditors noted there was no available BWC recording for one of the complaint incidents, and the investigator did not conduct an in-person interview with the R/P. As a result, the investigator should have attempted to contact the R/P and document any attempts to obtain necessary evidence to make credible determinations regarding the R/P's specific allegations.

Recommendations

For investigations where no BWC or telephone recordings are available to support the complainants' allegations, it is recommended the AV Stations collect all additional evidence necessary to support the credibility of the investigation's findings. This includes making reasonable efforts to contact the R/P. Documenting these efforts is also important to ensure transparency and to demonstrate that all reasonable steps were taken to obtain relevant evidence and support reliable conclusions.

Objective No. 1(k) – Reliability of the Investigation

Criteria

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

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

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

Per the MT, when the disposition of the WCSCR investigation on the Result of Service Comment Review is classified as "Employee Conduct Should Have Been Different", the appropriateness of any corrective action[12] taken should be assessed.

Procedures

The auditors reviewed all documentation in the completed investigation packets, including incident reports, supplemental reports, and booking packets. Additionally, the auditors reviewed all available BWC and audio recordings, along with interviews conducted with the complainant and civilian witnesses. Furthermore, the auditors reviewed the statements of the Department members and Department member witnesses involved. The auditors determined whether the WCSCR investigations were as thorough as necessary to reach reliable and complete findings.

Findings

For the AV Stations combined, 15 (94%) of the 16 WCSCR investigations met the criteria for this objective because the complaint investigations were as thorough as necessary to reach reliable and complete findings.

For Lancaster Station, six (86%) of the seven WCSCR investigations met the criteria for this objective because the complaint investigations were as thorough as necessary to reach reliable and complete findings. The remaining one (14%) WCSCR investigation did not meet the criteria.

For Palmdale Station, all nine (100%) WCSCR investigations met the criteria for this objective because the complaint investigations were as thorough as necessary to reach reliable and complete findings. The remaining one (11%) WCSCR investigation did not meet the criteria.

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

Specifically:

L-5: The investigator did not attempt to contact the R/P to clarify the allegations. If the investigator had been able to reach the R/P, the allegations may have been clarified. Due to the lack of BWC recordings, and the lack of a follow-up interview with the R/P, the auditors did not have sufficient evidence to confirm that the investigation was conducted thoroughly enough to reach reliable and complete findings.

Recommendations

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

CONCLUSION

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

The AAB will continue to conduct audits to uphold transparency and accountability, assess progress, and provide recommendations for ongoing improvement at the AV Stations. These efforts are essential in assisting the AV Stations to achieve their goals of adhering 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.

SUMMARY OF RECOMMENDATIONS

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

Objective 1 – Investigation of Complaints

j) **Collect All Evidence:** For investigations where no BWC or telephone recordings are available to support the complainants' allegations, it is recommended the AV Stations collect all additional evidence necessary to support the credibility of the investigation's findings. This includes making reasonable efforts to contact the R/P. Documenting these efforts is also important to ensure transparency and to demonstrate that all reasonable steps were taken to obtain relevant evidence and support reliable conclusions.

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 APPLICATIONS

- Performance Recording and Monitoring System (PRMS), Service Comment Module
- Report Navigator
- LASD.Evidence.com

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:
    - 3-04/010.05, Procedures for Department Services Reviews (December 2013)
    - 3-04/010.25, Personnel Complaints (October 2014)
- Proposed Draft Service Comment Review Handbook (August 2022)
- Administrative Investigations Handbook (October 2005)

Views of Responsible Officials

On May 16, 2025, Palmdale Station command staff submitted a response to the AAB concurring with the corresponding audit findings. On May 16, 2025, Lancaster Station command staff submitted a response to the AAB concurring with three of the six corresponding audit 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