

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

AUDIT AND ACCOUNTABILITY BUREAU



Part II of Public Complaints Audit

Assessment of Initiating and Classifying Public Complaints
Antelope Valley Stations
Project No. 2024-57-A



EXECUTIVE SUMMARY

The County of Los Angeles, the Los Angeles County Sheriff’s Department (LASD or Department), and the United States Department of Justice (DOJ) entered into the Antelope Valley (AV) Settlement Agreement (Agreement) on April 28, 2015¹, with the goal of ensuring police services are provided to the AV community in a manner that fully complies with the Constitution and the laws of the United States. The Department is expected to implement the mandated stipulations of the Agreement to effectively ensure both public and deputy safety, while fostering a renewed public confidence in the LASD.

The Audit and Accountability Bureau (AAB) was authorized by the Sheriff of Los Angeles County, the DOJ, and the AV Monitoring Team (MT) to conduct audits of the Department’s public complaints process. These limited scope audits, referred to by the AAB as “mini” audits, focused on a narrow set of audit objectives and specific audit populations. For Part II of the Public Complaints Audit, auditors examined the initiation and classification of public complaints and provided Lancaster Station and Palmdale Station (AV Stations) with timely feedback, allowing for necessary operational improvements.

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

| Part | Audit |
|------|-----------------------------------------------------------------------------------|
| I | Assessment of Availability and Acceptance of Complaint Information |
| II | Initiating and Classifying of Public Complaints |
| III | Investigation and Management Review & Oversight of Public Complaints ² |

For Part II of the Public Complaints audits, three audits were conducted (2024-1-A, 2024-16-A, and 2024-24-A). However, two supplemental audits (2024-16-S and 2024-24-S) were later completed to address the compliance issues identified in previously mentioned audits.³

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

² Per discussion with the MT, for future audits, Part III will be titled, “Investigation and Adjudication of Public Complaints.”

³ Audits 2024-16-A was published on 06/27/2024 and 2025-24-A was published on 09/03/2024. The corresponding supplemental audits, 2024-16-S was published on 11/21/2024 and 2024-24-S was published on 12/05/2024.

The issues were primarily related to the incomplete Watch Commander’s Service Comment Reports (WCSCRs) at Lancaster Station, which had significantly impacted the overall compliance rates.

The findings from both Lancaster and Palmdale Stations were incorporated into their respective supplemental reports (2024-16-S and 2024-24-S). As a result, the supplemental audits superseded the previous findings and were updated to reflect the compliance rates and audit results for both stations.

The table below lists the project numbers, published dates, and audit population time periods for three prior audits as well as this audit which is discussed in further detail below:

| Project No. | Published Date | Population Time Period |
|-------------------------------|-------------------|---------------------------------------------------------|
| 2024 – 1 – A | May 16, 2024 | October 1, 2023, through December 31, 2023 ⁴ |
| 2024 – 16 – S | November 21, 2024 | October 1, 2023, through December 31, 2023 ⁵ |
| 2024 – 24 – S | December 5, 2024 | January 1, 2024, through March 31, 2024 |
| 2024 – 57 -A | - | April 1, 2024, through July 31, 2024 |

After the completion of the three prior audits, the auditors prepared a thorough Comprehensive Review Report (review), Project No. 2024-43-A. The review outlined patterns, trends and observations identified in three prior audits. The review, published on February 11, 2025, focused on highlighting key areas of concern and provided actionable recommendations to address the issues identified throughout the auditing process.

Following the completion of the review, the AAB conducted this audit for a comparative analysis of the findings from the three prior audits. The main objective of this audit was to assess the effectiveness of the audit process and evaluate the extent to which the AV Stations have improved in meeting the established AV Agreement Compliance Metrics (compliance metrics).

⁴ For the period of October 1, 2023, through December 31, 2023, none of the WCSCR investigations were completed at the time the population was being generated for 2024-1-A. As a result, AAB extended the audit period to January 1, 2023, through December 31, 2023, to identify completed WCSCR investigations.

⁵ Since the audit period for 2024-1-A was modified, the population for October 1, 2023, through December 31, 2023, was re-evaluated for 2024-16-A/S.

The table below outlines the audit objectives along with their corresponding compliance and compliance metrics.

Summary of Compliance Metrics Findings

| Obj. No. | Audit Objectives | Lancaster % | Palmdale % | AV Total | Compliance Metrics % |
|----------|-------------------------------------------------------------------------------------------|------------------|------------|----------|----------------------|
| 1 | INITIATING AND CLASSIFYING PUBLIC COMPLAINTS | | | | |
| 1(a) | <i>Prompt Initiation of Complaint</i> | 67% | 67% | 67% | 100% |
| 1(b) | <i>Discouraging or Inhibiting a Complaint</i> | 67% | 67% | 67% | 95% |
| 1(c) | <i>Watch Commander Initiate a WCSCR or Provide Justification in Watch Commander's Log</i> | 0% | 100% | 17% | 100% |
| 1(d) | <i>Field Supervisors Documentation of Contacts That Did Not Constitute a Complaint</i> | NIN ⁶ | 0% | 0% | 100% |
| 1(e) | <i>Identify all Significant Allegations in a Complaint</i> | 33% | 50% | 42% | 95% |
| 1(f) | <i>Misconduct Alleged in Civil Claims and Lawsuits</i> | 100% | 100% | 100% | 100% |
| 1(g) | <i>Service Versus Personnel Complaints</i> | 67% | 67% | 67% | 95% |
| 1(h) | <i>WCSCR Versus Administrative Investigation</i> | 100% | 100% | 100% | 95% |

The auditors noted two areas where the AV Stations and the Department met the established compliance metrics during the audit period. Specifically:

- Misconduct Alleged in Civil Claims and Lawsuits
- WCSCR Versus Administrative Investigation

The AAB will follow up on the implementation of any recommendations resulting from this audit that were not addressed in the review.

⁶ NIN refers to "No Incidents Notes."

The table below outlines the audit objectives and their corresponding compliance metrics findings from the three previous audits, including the results from this audit. The auditors assessed the AV Stations individually for each objective and combined the results to evaluate the overall compliance.

Summary of Cumulative Compliance Metrics Findings

| Obj. No. | Audit Objectives | 2024-1-A | 2024-16-S | 2024-24-S | 2024-57-A | Compliance Metrics % |
|----------|-------------------------------------------------------------------------------------------|----------|-----------|------------------|-----------|----------------------|
| 1 | Initiating and Classifying Public Complaints | | | | | |
| 1(a) | <i>Prompt Initiation of Complaint</i> | 50% | 60% | 100% | 67% | 100% |
| 1(b) | <i>Discouraging or Inhibiting a Complaint</i> | 100% | 90% | 75% | 67% | 95% |
| 1(c) | <i>Watch Commander Initiate a WCSCR or Provide Justification in Watch Commander's Log</i> | 13% | 33% | 50% | 17% | 100% |
| 1(d) | <i>Field Supervisors Documentation of Contacts that did not Constitute a Complaint</i> | 63% | 100% | NIN ⁷ | 0% | 100% |
| 1(e) | <i>Identify all Significant Allegations in a Complaint</i> | 83% | 70% | 63% | 42% | 95% |
| 1(f) | <i>Misconduct Alleged in Civil Claims and Lawsuits</i> | 33% | 25% | 0% | 100% | 100% |
| 1(g) | <i>Service versus Personnel Complaints</i> | 100% | 100% | 100% | 67% | 95% |
| 1(h) | <i>WCSCR versus Administrative Investigation</i> | 100% | 100% | 100% | 100% | 95% |

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

⁷ There were no Mobile Digital Computer (MDC) entries with clearance code 777 during the time period for auditors to review. The MDC is a mobile laptop computer equipped in each patrol vehicle to provide a complete Computer-Aided Dispatch (CAD) package in a mobile environment. The CAD system is a multi-faceted computer system the Department uses to log or document patrol-related incidents. It maintains electronic records of patrol activities, which includes Dispatch-generated 911 and general "Calls for Services" and patrol deputy-initiated "Observation" stop records in the field.

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

**Part II of Public Complaints Audit:
Assessment of Initiating and Classifying Public Complaints
Antelope Valley Stations
Project No. 2024-57-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 Justice¹ (DOJ) Antelope Valley (AV) Settlement Agreement (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.

Additionally, Paragraph 149 of the Agreement states:

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

BACKGROUND

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

¹ [United States of America v. The County of Los Angeles and The Los Angeles County Sheriff's Department. Case Number CV 15-03174, April 28, 2015.](#)

The AAB was authorized by the Sheriff of Los Angeles County, the DOJ, and the AV Valley Monitoring Team (MT) to conduct audits of the Department’s public complaints process. These limited scope audits, referred to by the AAB as “mini” audits, focused on a narrow set of audit objectives and specific audit populations. The mini audits were intended to provide Lancaster Station and Palmdale Station (AV Stations) timely feedback, facilitate opportunities for operational improvements, and demonstrate an increasing commitment toward meeting the established AV Agreement Compliance Metrics (compliance metrics).

For Part II of the Public Complaints Audit, the auditors conducted three audits (2024-1-A, 2024-16-A, and 2024-24-A) to examine the initiation and classification of public complaints at AV Stations. However, two supplemental audits (2024-16-S and 2024-24-S), were later completed to address the compliance² issues identified in the previous mentioned audits.³ The issues were primarily related to incomplete Watch Commander’s Service Comment Reports (WCSCRs) investigations at Lancaster Station, which significantly impacted the overall compliance rates.

The updated findings from both Lancaster and Palmdale Stations were incorporated into their respective supplemental audit reports. As a result, the supplemental audits superseded the previous findings and were updated to reflect the compliance rates and audit results for both stations.

Additionally, the auditors prepared a Comprehensive Review Report (review), Project No. 2024-43-A, outlining patterns, trends, and observations resulting from three prior audits for Part II – Initiating and Classifying Public Complaints. The review was conducted and published on February 11, 2025, with corresponding results which were relevant to this audit. The review highlighted key areas of concern and provided actionable recommendations to address the issues identified throughout the auditing process.

The AAB conducted this audit (Project No. 2024-57-A) as part of its ongoing oversight of AV Stations, incorporating analysis and comparison of the findings from three prior audits. The main objective of this audit was to assess the effectiveness of the audit process and evaluate the extent to which the AV Stations have improved in meeting the established compliance metrics.

² Compliance when mentioned throughout the report refers to whether the AV Stations met the established AV Agreement Compliance Metrics (compliance metrics).

³ Audits 2024-16-A was published on 06/27/2024 and 2024-24-A was published on 09/03/2024. The corresponding supplemental audits, 2024-16-S was published on 11/21/2024 and 2024-24-S was published on 12/05/2024.

The table below is a list of the project numbers, published dates, and audit population time periods of the three prior audits conducted as well as this audit:

| Project No. | Published Date | Population Time Period |
|-------------------------------|-------------------|---------------------------------------------------------|
| 2024 – 1 – A | May 16, 2024 | October 1, 2023, through December 31, 2023 ⁴ |
| 2024 – 16 – S | November 21, 2024 | October 1, 2023, through December 31, 2023 ⁵ |
| 2024 – 24 – S | December 5, 2024 | January 1, 2024, through March 31, 2024 |
| 2024 – 57 -A | - | April 1, 2024, through July 31, 2024 |

OBJECTIVE, SCOPE, AND METHODOLOGY

Audit Scope and Criteria

The scope of this audit evaluated the aspects of the initiation and classification of public complaints. Additionally, if any patterns of professional misconduct, or discourtesy were observed, the auditors identified and reported these issues to management.

An audit work plan was submitted to the MT and the DOJ for input prior to the start of the audit.

Audit Population and Sampling

The selected audit period for this audit was from April 1, 2024, through July 31, 2024. The audit population was contingent upon the timely completion of investigations by the AV Stations. For this audit, the WCSCR investigations were considered complete once they were reviewed and approved by the North Patrol Division (NPD). The auditors reviewed a total of 12 WCSCR investigations for this audit, six for each AV station. Lancaster Station had completed six WCSCR investigations during the audit period and all six were evaluated in this audit. Palmdale Station completed 32 WCSCR investigations and auditors randomly selected six using a random sampling application.

⁴ For the period of October 1, 2023, through December 31, 2023, none of the WCSCR investigations were completed at the time the population was being generated for 2024-1-A. As a result, AAB extended the audit period to January 1, 2023, through December 31, 2023, to identify completed WCSCR investigations.

⁵ Since the audit period for 2024-1-A was modified, the population for October 1, 2023, through December 31, 2023, was re-evaluated for 2024-16-A/S.

Audit Population and Sample

| WCSCR Investigations Initiated | | WCSCR Investigations Completed when Population was Selected | | Completed WCSCR Investigations Audited | |
|--------------------------------|----------|-------------------------------------------------------------|-----------------|----------------------------------------|----------|
| Lancaster | Palmdale | Lancaster | Palmdale | Lancaster | Palmdale |
| 39 ⁶ | 41 | 6 ⁷ | 32 ⁸ | 6 | 6 |

Audit Procedures

The auditors reviewed the compliance metrics related to public complaints, and examined the public complaint processes, materials, and documents. This included completed WCSCR investigations, 154 Watch Commander’s log entries, 136 telephone calls from the watch commander lines, as well as civil claims, lawsuits and Mobile Digital Computer (MDC)⁹ entries. The auditors conducted detailed testing using audit tools designed to assess the different audit objectives. The associated documentation and Body Worn Camera (BWC) recordings, when applicable, were evaluated for each selected audit sample. The auditors provided a detailed summary of the procedures and audit findings within each objective. The information was analyzed by the auditors, and their findings were methodically recorded in work papers¹⁰ and subjected to additional levels of review.

Summary of Findings

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

⁶ Forty-two WCSCR investigations were initiated for Lancaster Station during the audit period. However, three of the 42 investigations were voided.

⁷ Eleven of the 39 WCSCR investigations initiated during the audit period were completed for Lancaster Station when the population was selected. However, five of the 11 completed investigations were excluded from the population because they resulted from a UOF incident.

⁸ Thirty-eight of the 41 WCSCR investigations initiated during the audit period were completed for Palmdale Station when the population was selected. However, six of the 38 completed investigations were excluded from the population because they resulted from a UOF incident.

⁹ The MDC is a mobile laptop computer equipped in each patrol vehicle to provide a complete Computer-Aided Dispatch (CAD) package in a mobile environment. The CAD system is a multi-faceted computer system the Department uses to log or document patrol-related incidents. It maintains electronic records of patrol activities, which include Dispatch-generated 911 and general "Calls for Services" and patrol deputy-initiated "Observation" stop records in the field.

¹⁰ 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 conclusion.

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 | INITIATING AND CLASSIFYING PUBLIC COMPLAINTS | | | | |
| 1(a) | <i>Prompt Initiation of Complaint</i> | 67% | 67% | 67% | 100% |
| 1(b) | <i>Discouraging or Inhibiting a Complaint</i> | 67% | 67% | 67% | 95% |
| 1(c) | <i>Watch Commander Initiate a WCSCR or Provide Justification in Watch Commander's Log</i> | 0% | 100% | 17% | 100% |
| 1(d) | <i>Field Supervisors Documentation of Contacts That Did Not Constitute a Complaint</i> | NIN ¹¹ | 0% | 0% | 100% |
| 1(e) | <i>Identify all Significant Allegations in a Complaint</i> | 33% | 50% | 42% | 95% |
| 1(f) | <i>Misconduct Alleged in Civil Claims and Lawsuits</i> | 100% | 100% | 100% | 100% |
| 1(g) | <i>Service Versus Personnel Complaints</i> | 67% | 67% | 67% | 95% |
| 1(h) | <i>WCSCR Versus Administrative Investigation</i> | 100% | 100% | 100% | 95% |

¹¹ NIN refers to No Incidents Noted.”

The table below outlines the audit objectives and their corresponding compliance metrics from three previous audits as well as this audit. The auditors assessed the AV Stations individually for each objective and combined the results to evaluate the overall population.

Summary of Cumulative Compliance Metrics Findings

| Obj. No. | Audit Objectives | 2024-1-A | 2024-16-S | 2024-24-S | 2024-57-A | Compliance Metrics % |
|----------|-------------------------------------------------------------------------------------------|----------|-----------|-------------------|-----------|----------------------|
| 1 | INITIATING AND CLASSIFYING PUBLIC COMPLAINTS | | | | | |
| 1(a) | <i>Prompt Initiation of Complaint</i> | 50% | 60% | 100% | 67% | 100% |
| 1(b) | <i>Discouraging or Inhibiting a Complaint</i> | 100% | 90% | 75% | 67% | 95% |
| 1(c) | <i>Watch Commander Initiate a WCSCR or Provide Justification in Watch Commander's Log</i> | 13% | 33% | 50% | 17% | 100% |
| 1(d) | <i>Field Supervisors Documentation of Contacts that did not Constitute a Complaint</i> | 63% | 100% | NIN ¹² | 0% | 100% |
| 1(e) | <i>Identify all Significant Allegations in a Complaint</i> | 83% | 70% | 63% | 42% | 95% |
| 1(f) | <i>Misconduct Alleged in Civil Claims and Lawsuits</i> | 33% | 25% | 0% | 100% | 100% |
| 1(g) | <i>Service versus Personnel Complaints</i> | 100% | 100% | 100% | 67% | 95% |
| 1(h) | <i>WCSCR versus Administrative Investigation</i> | 100% | 100% | 100% | 100% | 95% |

¹² There were no Mobile Digital Computer (MDC) entries with clearance code 777 during the time period for auditors to review. The MDC is a mobile laptop computer equipped in each patrol vehicle to provide a complete Computer-Aided Dispatch (CAD) package in a mobile environment. The CAD system is a multi-faceted computer system the Department uses to log or document patrol-related incidents. It maintains electronic records of patrol activities, which includes Dispatch-generated 911 and general "Calls for Services" and patrol deputy-initiated "Observation" stop records in the field.

Detailed Findings

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

Objective No. 1 – Initiating and Classifying Public Complaints

This objective evaluated the specified investigatory requirements for public complaint investigations, as detailed in the compliance metrics.

Objective No. 1(a) – Prompt Initiation of Complaint

Criteria

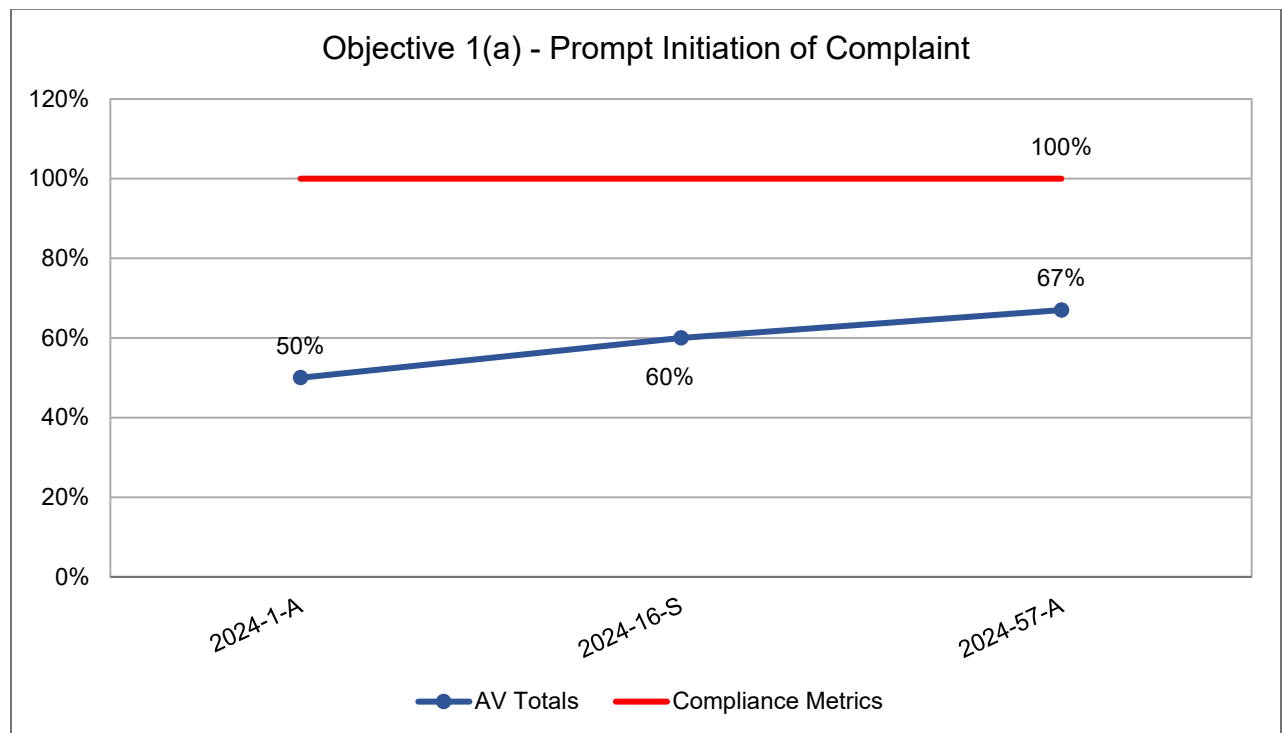
There are no specific compliance metrics for this sub-objective; however, in the MT's 2020 Audit of Community Complaints (Sub-Objective 2.5), the MT analyzed all 52 complaints in the audit population to determine whether AV supervisors were promptly initiating a WCSCR investigation.

Procedures

For each of the 12 audited cases, the auditors reviewed the intake interviews (audio and/or video), email complaint forms, and BWC recordings, as well as recorded telephonic conversations obtained from LASD.Evidence.com. The auditors compared the information; specifically, the date and time the complainant made the allegation, with the date and time the complaint was initiated, as documented on the WCSCR form.

The line graph below demonstrates the AV Stations met the established compliance metrics for Objective 1(a) in one of the four audits.

| Obj. No. | Audit Objectives | 2024-1-A | 2024-16-S | 2024-24-S | 2024-57-A | Compliance Metrics % |
|----------|-----------------------------------------------------|----------|-----------|-----------|-----------|----------------------|
| 1 | Initiating and Classifying Public Complaints | | | | | |
| 1(a) | <i>Prompt Initiation of Complaint</i> | 50% | 60% | NIN | 67% | 100% |



Findings

For the AV Stations combined, eight (67%) of the 12 WCSCR investigations reviewed met the criteria for this objective because a WCSCR investigation was initiated without delay. The remaining four (33%) WCSCR investigations did not meet the criteria for this objective because the WCSCR investigation was not initiated.

For Lancaster, four (67%) of the six WCSCR investigations reviewed met the criteria for this objective because a WCSCR investigation was initiated without delay. The remaining two (33%) WCSCR investigations did not meet the criteria for this objective because the WCSCR investigation was not initiated.

For Palmdale, four (67%) of the six WCSCR investigations reviewed met the criteria for this objective because a WCSCR investigation was initiated without delay. The remaining two (33%) WCSCR investigations did not meet the criteria for this objective because the WCSCR investigation was not initiated.

Specifically:

L-1¹³: Based on the WCSCR investigation, during a use of force investigation interview conducted on March 3, 2024, the Reporting Party (R/P) made allegations of misconduct to a supervisor (Field Sergeant). The complainant alleged a deputy was disrespectful (Personnel Complaint – Discourtesy) and did not handle the traffic stop correctly (Personnel Complaint – Neglect of Duty). Upon receiving these allegations, the field sergeant should have either notified the on-duty watch commander or initiated a WCSCR investigation. However, it was not until June 18, 2024, approximately 137 days after the allegations were first reported the lieutenant conducting a review of the use of force investigation became aware of these misconduct allegations and initiated the WCSCR investigation.

L-3: Based on the WCSCR investigation, while conducting a telephone audit, the on-duty watch commander became aware the deputy assigned to desk duties failed to notify a supervisor after the complainant requested to speak with a supervisor on several occasions. The deputy transferred the complainant's call to the watch sergeants line, which went to voicemail. Based on the above, the on-duty watch commander initiated a WCSCR investigation (Personnel Complaint – Neglect of Duty) on the deputy assigned to work the desk for failing to properly transfer a call to a supervisor.

P-4¹⁴: The WCSCR complaint was submitted online on April 22, 2024, via the Department's webpage at approximately 10:39 PM. However, a Field Sergeant responded on scene and contacted the complainant during the initial traffic stop, which occurred earlier at approximately 2:44 PM. The complainant alleged the deputy was disrespectful (Personnel Complaint – Discourtesy). After being made aware of the misconduct allegation, the Field Sergeant should have notified the on-duty watch commander of the allegation or initiated a WCSCR investigation.

P-5: During the WCSCR intake call with the watch commander regarding a personnel complaint (Neglect of Duty and Discrimination), the complainant stated he was discouraged from filing a complaint because when he went to the station lobby, he was told the watch commander was in a meeting. Based on the statement made by the complainant, the watch commander marked the box on the WCSCR intake form indicating the complainant was discouraged from filing a complaint.

¹³ L refers to Lancaster Station. The number represents the sample being referred to of those reviewed by Lancaster Station.

¹⁴ P refers to Palmdale Station. The number represents the sample being referred to of the three WCSCR investigation reviewed for Palmdale Station

Recommendations

It is recommended the AV Stations' command staff create a corrective action plan to address station personnel who delay the initiation of a WCSCR investigation. These plans may include documenting the violations through corrective action counseling or an Administrative Investigation. Additionally, the AV Stations' command staff should ensure all supervisors are aware of and comply with the provisions outlined in the Service Comment Report (SCR) Handbook.

Objective No. 1(b) – Discouraging or Inhibiting a Complaint

Criteria

Antelope Valley Compliance Metrics, Public Complaints, Complaint Intake, Paragraphs 125 and 126 (October 2019), Section 3F state:

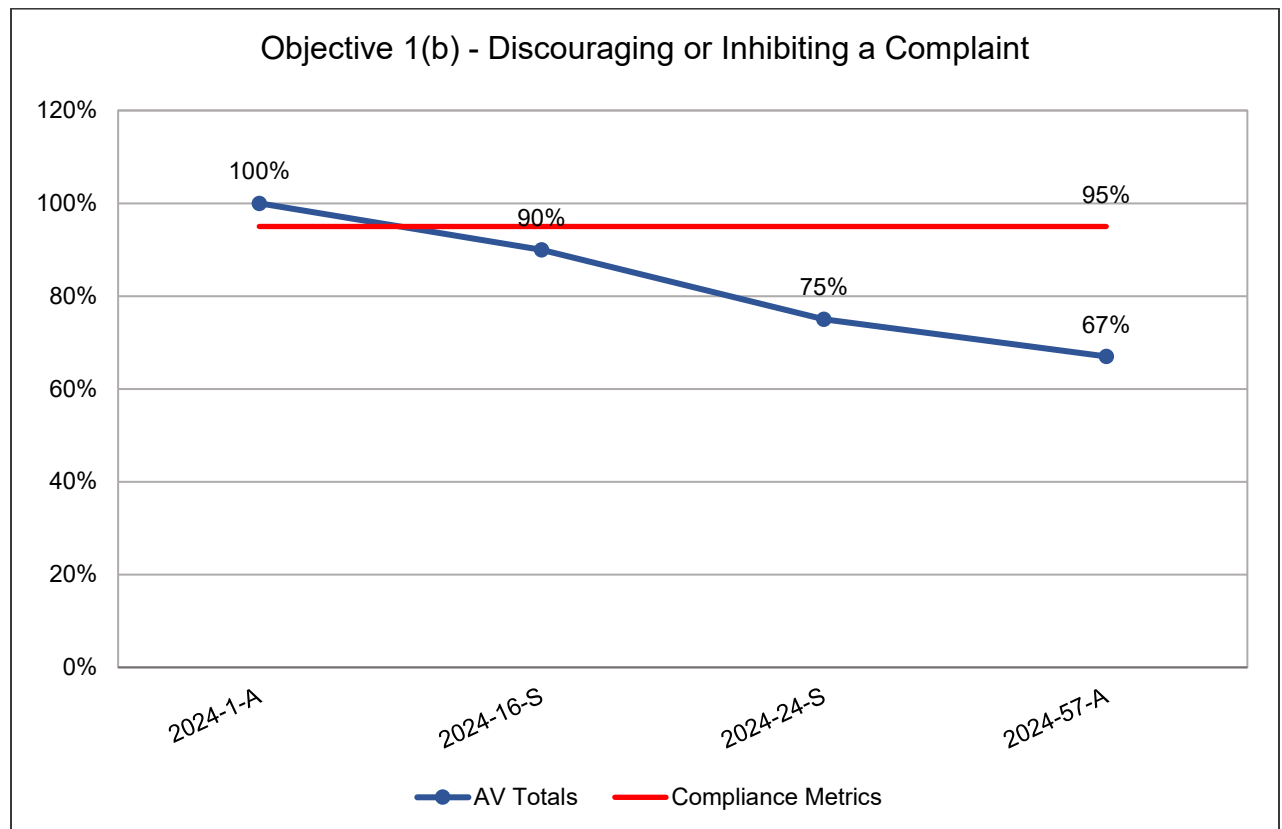
***In 95% of cases** when an employee is found to have refused to accept a personnel complaint, discouraged the filing of a complaint, or provided false or misleading information about filing a complaint, appropriate corrective action is taken, to potentially include discipline up to and including termination.*

Procedures

For each of the 12 audited cases, the auditors reviewed the intake interviews (audio and/or video), email complaint forms, and completed investigations for any evidence in which a Department member refused to accept a complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint.

The line graph below demonstrates the AV Stations met the established compliance metrics for Objective 1(b) in the first audit; however, the compliance decreased with each subsequent audit.

| Obj. No. | Audit Objectives | 2024-1-A | 2024-16-S | 2024-24-S | 2024-57-A | Compliance Metrics % |
|----------|-----------------------------------------------------|----------|-----------|-----------|-----------|----------------------|
| 1 | Initiating and Classifying Public Complaints | | | | | |
| 1(b) | <i>Discouraging or Inhibiting a Complaint</i> | 100% | 90% | 75% | 67% | 95% |



Findings

For the AV Stations combined, eight (67%) of the 12 WCSCR investigations reviewed met the criteria for this objective because auditors determined there was no evidence AV Station personnel refused or discouraged the complainant from filing a complaint. The remaining four (33%) investigations did not meet the criteria for this objective because the supervisor did not initiate a WCSCR investigation.

For Lancaster, four (67%) of the six WCSCR investigations reviewed met the criteria for this objective because auditors determined there was no evidence Lancaster Station personnel refused or discouraged the complainant from filing a complaint. The remaining two (33%) investigations did not meet the criteria for this objective because the supervisor did not initiate a WCSCR investigation, or a department member did not notify and/or transfer the complainant to speak with the on-duty watch commander.

For Palmdale, four (67%) of the six WCSCR investigations reviewed met the criteria for this objective because auditors determined there was no evidence Lancaster Station personnel refused or discouraged the complainant from filing a complaint. The remaining two (33%) investigations did not meet the criteria for this objective because the supervisor did not initiate a WCSCR investigation, or a department member did not notify or transfer the complainant to speak with the on-duty watch commander.

Specifically:

L-1: Based on the WCSCR investigation, during a use of force investigation interview conducted on March 3, 2024, the R/P made allegations of misconduct to a supervisor (Field Sergeant). The complainant alleged a deputy was disrespectful (Personnel Complaint – Discourtesy) and did not handle the traffic stop correctly (Personnel Complaint – Neglect of Duty). Upon receiving these allegations, the field sergeant should have either notified the on-duty watch commander or initiated a WCSCR investigation. However, it was not until June 18, 2024, approximately 137 days after the allegations were first reported the lieutenant conducting a review of the use of force investigation became aware of these misconduct allegations and initiated the WCSCR investigation.

L-3: Based on the WCSCR investigation, while conducting a telephone audit, the on-duty watch commander became aware the deputy assigned to desk duties failed to notify a supervisor after the R/P had requested to speak with a supervisor on several occasions. The deputy transferred the R/P's call to the watch sergeants line, which went to voicemail. Based on the above, the on-duty watch commander initiated a WCSCR investigation and marked the box indicating the complainant was discouraged from making the complaint.

P-4: The WCSCR complaint was submitted online on April 22, 2024, via the Department's webpage at approximately 10:39 PM. However, a field sergeant responded on scene and contacted the complainant during the initial traffic stop which occurred earlier at approximately 2:44 PM. The complainant alleged the deputy was, disrespectful (Personnel Complaint – Discourtesy). After being made aware of the misconduct allegation, the field sergeant should have notified the on-duty watch commander of the allegation or initiated a WCSCR investigation.

P-5: During the WCSCR intake call with the watch commander, regarding a WCSCR investigation for a personnel complaint (Neglect of Duty and Discrimination) the complainant stated he was discouraged from filing a complaint because when he went to the station lobby, he was told the watch commander was in a meeting. The watch commander marked the box on the WCSCR intake form indicating that the complainant was discouraged from filing a complaint.

Recommendations

It is recommended the AV Stations' command staff conduct briefings, along with documented (APIS rosters) training, to ensure their personnel are aware of the provisions in the Agreement, Department policy and Service Comment Report (SCR) Handbook as they relate to the intake of public complaints. Furthermore, an appropriate corrective action plan must be created to address station personnel who have discouraged members of the public from filing a complaint. These violations of the Agreement must be documented in a memorandum to the NPD Chief for their consideration and disposition.

Objective No. 1(c) – Watch Commander Initiate a WCSCR or Provide Justification in the Watch Commander's Log

Criteria

There is no specific AV Compliance Metric percentage for this objective. However, the Antelope Valley Settlement Agreement, Compliance Metrics, Personnel Complaints, Complaint Intake, Paragraph 126 (October 2019), Section E states:

- 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

The auditors identified a specific week (November 3, 2024 – November 9, 2024) for this audit and reviewed telephone calls and entries made in the Watch Commander's log. The auditors reviewed a total of 136 calls from the watch commander telephone lines recorded on NICE Inform¹⁵ and 154 entries in the Watch Commander's Log in the Station/Bureau Administration Portal (SBAP).¹⁶

¹⁵ The NICE Inform is an online audio storage system used to archive incoming and outgoing calls (with additional capabilities).

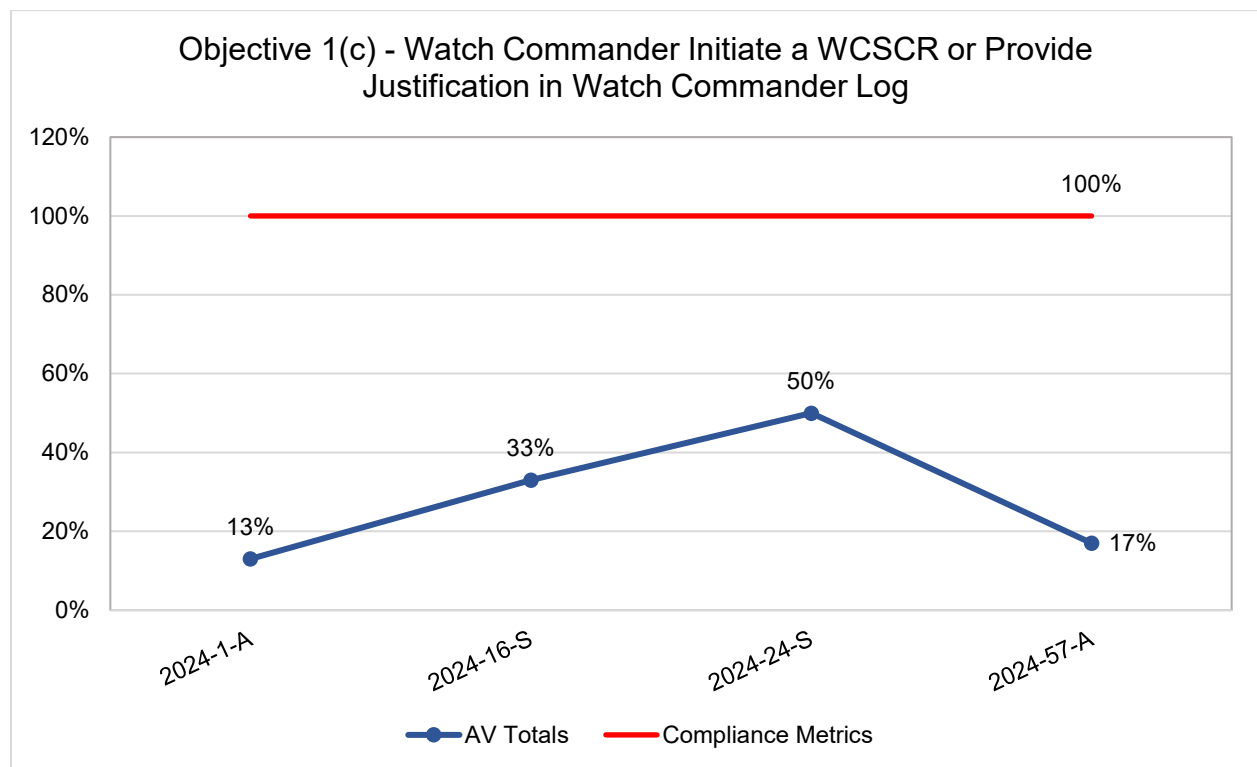
¹⁶ The SBAP is a data entry system designed to collect and track data related to risk management incidents, which are primarily used at a station level. The system includes data on Use of Force, Traffic Collisions, Public Comments, Pursuits, Administrative Investigations, Shots Fired, Employee Injuries, and Lawsuits & Civil Claims.

The auditors reviewed the watch commander telephone line calls to identify when an allegation of a complaint was made. Six of the 136 telephone calls required a WCSCR investigation or documentation of a suitable justification in the Watch Commander’s Log for not initiating a complaint. As a result, these six incidents were evaluated for this objective.

The auditors reviewed the Watch Commander’s Log to determine whether AV Station supervisors initiated a WCSCR investigation or documented a suitable justification as to why a WCSCR investigation was not necessary. For allegations that should have resulted in a WCSCR investigation, the auditors conducted a query in the Performance Recording Management System (PRMS) to confirm the initiation of the WCSCR.

The line graph below demonstrates the AV Stations did not meet the established compliance metrics for Objective 1(c) in all four of the audits.

| Obj. No. | Audit Objectives | 2024-1-A | 2024-16-S | 2024-24-S | 2024-57-A | Compliance Metrics % |
|----------|-------------------------------------------------------------------------------------------|----------|-----------|-----------|-----------|----------------------|
| 1 | Initiating and Classifying Public Complaints | | | | | |
| 1(c) | <i>Watch Commander Initiate a WCSCR or Provide Justification in Watch Commander’s Log</i> | 13% | 33% | 50% | 17% | 100% |



Findings

For the AV Stations combined, one (17%) of the six telephone calls met the criteria for this objective because auditors determined AV Station supervisors initiated a WCSCR investigation when they were made aware of each allegation or documented a suitable justification in the Watch Commander's Log as to why a WCSCR was not necessary. The remaining five (83%) did not meet the criteria because a WCSCR investigation was not initiated, nor documented in the Watch Commander's Log as to why a WCSCR was not necessary. In all five incidents, allegations of misconduct were made to a supervisor either over the telephone or in person. Four should have resulted in service complaints and one should have resulted in a personnel complaint.

For Lancaster, all five (0%) of the telephone calls did not meet the criteria because a WCSCR investigation was not initiated nor documented in the Watch Commander's Log as to why a WCSCR was not necessary.

For Palmdale Station, the one (100%) telephone call met the criteria for this objective because the auditors determined AV Station supervisors initiated a WCSCR investigation when they were made aware of each allegation or documented a suitable justification in the Watch Commander's Log for not initiating a complaint.

Specifically:

L-1: Personnel Complaint: Neglect of Duty - The complainant alleged when deputies responded to the location (Walmart) on October 28, 2024, regarding a possible criminal threat call for service against a security guard, the deputies did not handle the call correctly. She further added she informed the deputies of the specific residence where the suspects were last seen entering, but the deputies failed to follow up at that location. Additionally, the complainant stated on several other occasions she has called Lancaster Station regarding incidents at Walmart, noting that deputies either did not respond or arrived after an extended period. Per PRMS, a WCSCR investigation was not initiated, and no entry was made in the Watch Commander's Log documenting a suitable justification for not initiating a complaint.

L-2: Personnel Complaint: Neglect of Duty - The complainant alleged that deputies mishandled a burglary call for service on November 6, 2024. She stated she wanted to make an appointment at the station to file a complaint. The watch commander told her an appointment was unnecessary, and she could come into the station at any time, providing her with his available hours for that day. The complainant stated she would go to the station to file a complaint. Per PRMS, a WCSCR investigation was not initiated, and no entry was made in the Watch Commander's Log documenting a suitable justification for not initiating a complaint.

L-3: Personnel Complaint: Discourtesy - On November 7, 2024, during a telephone conversation with the on-duty watch commander, the complainant alleged she called Lancaster Station the previous day at 2:00 pm regarding a disturbance involving her neighbor, but deputies did not respond to her residence. She further stated she called the station to inquire about the deputies' arrival but was told to stop calling the station. Per PRMS, a WCSCR investigation was not initiated, and no entry was made in the Watch Commander's Log documenting a suitable justification for not initiating a complaint.

L-4: Personnel Complaint: Discourtesy - During the intake interview for a complaint (Lancaster WCSCR Sample L-2) regarding a traffic stop that had occurred a week prior, the complainant alleged a deputy made a statement that her son, who was arrested and booked at Lancaster Station, was transported to the Inmate Reception Center to "teach him a lesson". A WCSCR investigation was not initiated for this allegation of misconduct. Per PRMS, a WCSCR investigation was not initiated, and no entry was made in the Watch Commander's Log documenting a suitable justification for not initiating a complaint. However, a WCSCR was initiated for the other allegations that were made regarding the initial traffic stop that occurred on a different date.

L-5: Service Complaint: Response Time - While conducting a telephone audit, the on-duty watch commander became aware that the deputy assigned to desk duties failed to notify a supervisor after the complainant requested to speak with a supervisor on several occasions. The deputy transferred the complainant's call to the Watch Sergeant's line, which went to voice mail. Based on the above, the on-duty watch commander initiated a WCSCR investigation and marked the box indicating the complainant was discouraged from making the complaint. However, during the interaction between the deputy and the complainant, the complainant made statements to the Deputy that he was unhappy with the service related to deputies responding to his location for a vehicle theft report. A WCSCR investigation was not initiated for this allegation of misconduct.

Recommendations

The AAB recommends the AV Stations' command staff conduct weekly audits of Watch Commander's Log 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. It is further recommended the AV Stations' command staff contact the complainants from all three previous audits conducted by the AAB in which a WCSCR investigation was not initiated to accurately document and investigate the allegations.

Objective No. 1(d) – Field Supervisor’s Documentation of Contacts That Did Not Constitute a Complaint

Criteria

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

- 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, and Lancaster Station Unit Order, 69, 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 audit time period of April 1, 2024, to October 31, 2024, auditors evaluated the AV Stations' supervisors' entries in the MDC with clearance code 777 (assist citizen), 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 identified one MDC entry by Palmdale Station, which contained elements of a potential complaint. The entry was evaluated to determine whether supervisors provided suitable justifications in their entries when a member of the public initiated a complaint, and it was concluded no WCSCR investigation was necessary.

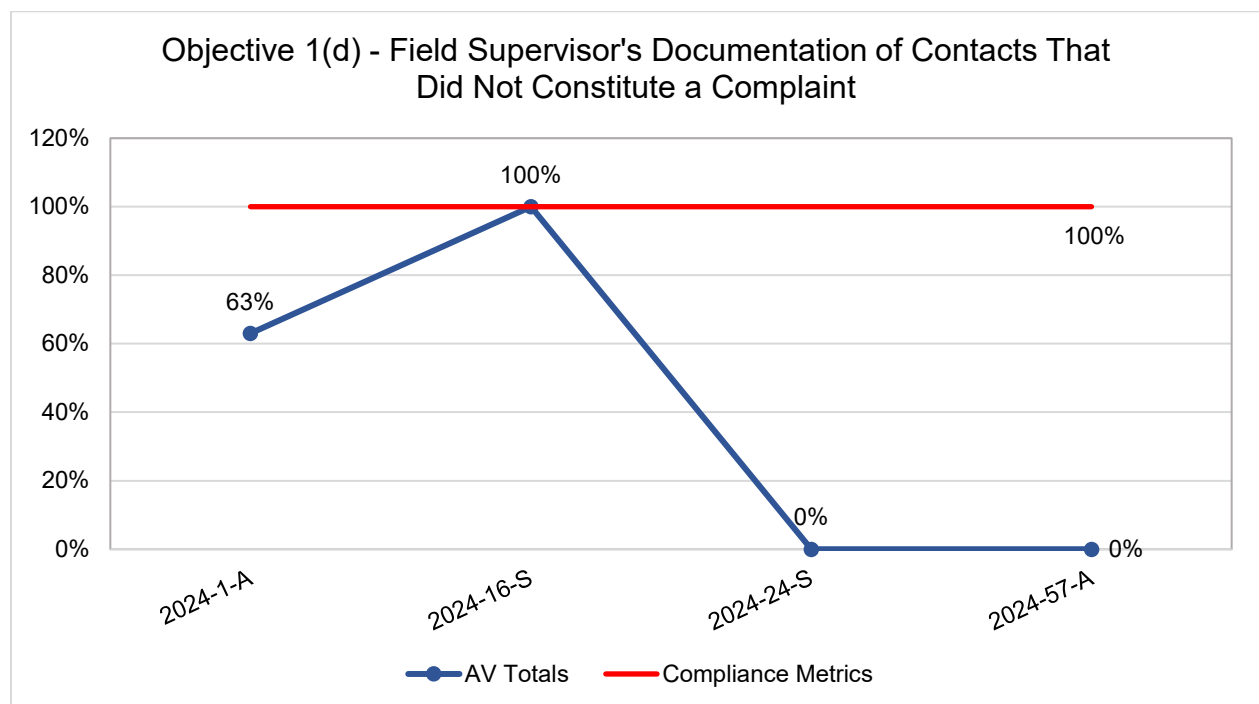
The auditors also reviewed the on-scene sergeant or lieutenant's BWC recordings for all incidents associated with complaints reviewed in Objectives 1(a) and 1(e) to determine if the complaint was either initiated promptly and appropriately or if the justification for not initiating a WCSCR investigation was properly documented in the MDC log.

The auditors reviewed the MDC entry along with its corresponding BWC recordings to verify the information documented in the MDC entry accurately describes what is depicted in the BWC recordings.

Additionally, auditors evaluated the 12 audited WCSCR investigative packets. Auditors specifically reviewed the intake interviews (audio and/or video) and email complaint forms for WCSCR investigations along with BWC recordings and recorded telephonic conversations obtained from LASD.Evidence.com to determine if there was any evidence that a field supervisor was on scene and made aware of the allegation. Out of the 12 WCSCR investigative packets, there was one separate incident in which a supervisor was on scene, made aware of alleged misconduct and did not immediately initiate a WCSCR investigation. These findings are documented in sub-objective 1(a); specifically, under sample P-4.

The line graph below demonstrates the AV Stations did not meet the established compliance metrics for Objective 1(d) in two of the four audits.

| Obj. No. | Audit Objectives | 2024-1-A | 2024-16-S | 2024-24-S | 2024-57-A | Compliance Metrics % |
|----------|-----------------------------------------------------------------------------------------|----------|-----------|-----------|-----------|----------------------|
| 1 | Initiating and Classifying Public Complaints | | | | | |
| 1(d) | <i>Field Supervisor's Documentation of Contacts That Did Not Constitute a Complaint</i> | 63% | 100% | NIN | 0% | 100% |



Findings

For Lancaster, there were no MDC entries with clearance code 777 that contained elements of a potential complaint during the time period for auditors to review.

For Palmdale, one (0%) MDC entry did not meet the criteria for this objective because auditors determined the supervisor did not provide a suitable justification in the MDC clearance regarding his contact with a member of the public.

Specifically:

P-1: A field sergeant responded to the location regarding a traffic collision investigation. The complainant alleged the deputy was discourteous and used profanity. The complainant asked the field sergeant if he could provide him with the name and badge number of the deputy who was discourteous. The field sergeant provided the complainant with the name and employee number. The complainant stated he was going to file a complaint. The field sergeant explained the complaint procedures, handed the complainant a Complaint Form and advised him that he could drop it off at the station. The field sergeant attempted to get the complainants name and date of birth; however, the complainant did not want to provide his full name and date of birth. The field sergeant documented his contact with the complainant; however, the allegations and the Field Sergeants actions were not documented in the MDC clearance narrative.

Recommendations

It is imperative for AV Station supervisors to properly document their contacts with civilians. The AAB recommends the AV Stations' Operations Staff conduct weekly audits of field sergeants' MDC logs when the 777 clearance code was used to ensure they are properly documenting complaints and non-complaint incidents while out in the field as detailed by Palmdale Station Unit Order, 14-06 and Lancaster Station Unit Order, 69. These audits should be conducted by personnel assigned to work as the on duty watch commander and document the results in the Watch Commander's log.

Furthermore, the AAB recommends the Department create a new, exclusive clearance code for instances a field supervisor contacts a member of the public regarding a potential complaint. This will allow AV Station management to easily track and differentiate between a citizen contact and a potential complaint.

Objective No. 1(e) – Identify all Significant Allegations in a Complaint

Criteria

Antelope Valley Compliance Metrics, Paragraphs 128, 130, 131 (partial) & 140 (partial) (October 2019), Section 3C states:

- C. For at least 95% of public complaints, each significant allegation of misconduct is identified, investigated and appropriately adjudicated, or the error is corrected during the management review.*

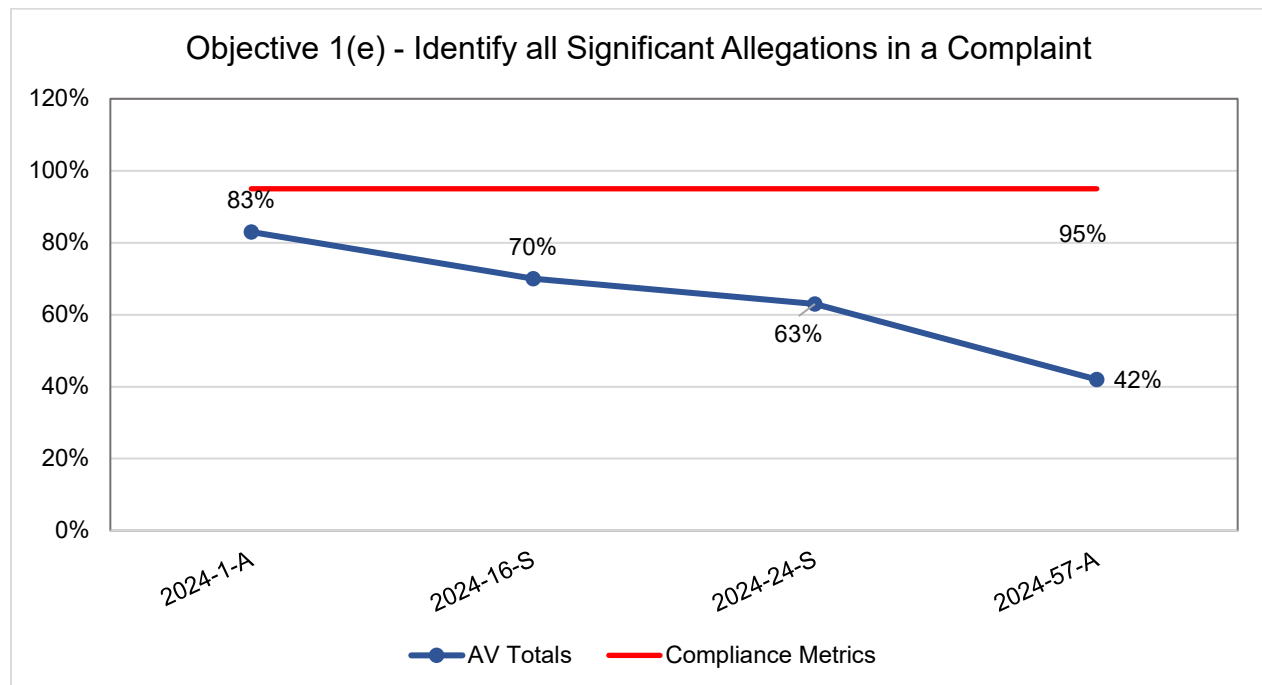
Procedures

The auditors evaluated 12 WCSCR investigative packets which were obtained from the AV Stations, as well as related audio/video files obtained from LASD.Evidence.com to determine whether each significant allegation was identified, investigated, adjudicated, and, if errors were noted, was the error corrected during the management review.

The auditors specifically reviewed the intake interviews (audio and/or video) and email complaint forms that pertained to the WCSCR investigation to identify the allegations made by the complainant. Additionally, the auditors reviewed BWC recordings that depicted the interaction between the deputies and complainants to confirm there were no further allegations of misconduct that should have been identified. The auditors compared the video/audio evidence to the WCSCR investigation to ensure every allegation of misconduct was identified, investigated, and appropriately adjudicated.

The line graph below demonstrates that the AV Stations did not meet the established compliance metrics for Objective 1(e) in the four audits.

| Obj. No. | Audit Objectives | 2024-1-A | 2024-16-S | 2024-24-S | 2024-57-A | Compliance Metrics % |
|----------|------------------------------------------------------------|----------|-----------|-----------|-----------|----------------------|
| 1 | Initiating and Classifying Public Complaints | | | | | |
| 1(e) | <i>Identify all Significant Allegations in a Complaint</i> | 83% | 70% | 63% | 42% | 95% |



Findings

For the AV Stations combined, five (42%) of the 12 WCSCR investigations reviewed met the criteria for this objective because the auditors determined each significant allegation was identified, investigated, and adjudicated. The remaining 7 (58%) investigations did not meet the criteria for this objective because the supervisor did not identify, investigate, or adjudicate each significant allegation.

For Lancaster, two (33%) of the six WCSCR investigations reviewed met the criteria for this objective because the auditors determined each significant allegation was identified, investigated and adjudicated. The remaining 4 (67%) investigations did not meet the criteria for this objective because the supervisor did not identify, investigate or adjudicate each significant allegation.

For Palmdale, three (50%) of the six WCSCR investigations reviewed met the criteria for this objective because the auditors determined each significant allegation was identified, investigated and adjudicated. The remaining three (50%) investigations did not meet the criteria for this objective because the supervisor did not identify, investigate or adjudicate each significant allegation.

Specifically:

L-1: Based on the WCSCR investigation, the investigator addressed the allegations for the personnel complaint (discourtesy and neglect of duty). However, during an interview out in the field with the field sergeant, the complainant stated that she was harassed. This allegation was not documented in the WCSCR intake form or investigation.

L-2: The investigator did not identify several remarks made by the involved deputy during his interaction with the detained individuals. The deputy was discourteous when asked why a witness was being handcuffed, responding, "Because I can." He also stated, "He's scared, dude," when referring to a witness, and "They are my regular customers," when referring to witnesses. Additionally, the deputy made an inappropriate comment to one of the witnesses regarding a previous arrest stating, "His DNA was on the gun." These statements should have been included in the WCSCR investigation along with the original allegations made by the complainant.

Furthermore, the disposition for discourtesy should have been, "Appears Conduct Should Have Been Better." The complainant's allegation was that the deputy damaged the glove compartment door. The investigator provided an explanation regarding why he believed it was not damaged and documented that a claim form was mailed to the complainant. This allegation was adjudicated with "Conduct Appears Reasonable"; however, because the WCSCR investigation did not include photographs to depict the extent of the damage, if any, auditors determined that the appropriate adjudication should have been "Unable to Determine."

L-5: The investigator properly adjudicated the allegations made against the male deputy (handling deputy) and the discourtesy allegation against the female deputy. During a telephone conversation with watch commander, the complainant stated he told the female deputy there was video footage of the incident. Based on the statement made by the complainant, neglect of duty should have been added to the allegation against the female deputy.

Additionally, the allegation against another male deputy (assisting deputy) for neglect of duty was adjudicated as "Conduct Could Have Been Better." Considering both male deputies had contact with the involved parties, the adjudication for the assisting deputy contradicts the adjudication for the same allegation against the handling deputy, which was adjudicated as "Conduct Should Have Been Different." Furthermore, the investigator identified two separate occasions in which the assisting deputy used profanity. While this was documented in the WCSCR investigation; it was not added to the compliant classification or complaint disposition.

L-6: The complaint stated, "Lancaster Station captain ordered not to send us any help to our neighborhood." This allegation should have been documented in the WCSCR intake form as a personnel complaint for neglect of duty, with the captain listed as an involved employee. Additionally, during the telephone call with the watch commander, the complainant stated the deputy working the desk ended the conversation when she hung up the telephone. This allegation was not addressed in the narrative portion of the WCSCR investigation, specifically in the recommended findings section, and this allegation should have been added as a personnel complaint for discourtesy.

P-2: The investigator addressed allegations of discrimination, racial profiling and the legality of the traffic violation. Based on the available evidence, the investigator appropriately adjudicated the allegations as "Conduct Appears Reasonable." The involved party also alleged the deputies made the statement "I hoped you had a gun," while at the Palmdale Station jail. The investigator adjudicated this allegation as "Conduct Appears Reasonable," and stated he was not able to retrieve any video footage from the station jail to dispute the involved party's claim. Based on the lack of additional evidence to dispute the allegation, the auditors determined the appropriate adjudication should have been "Unable to Determine."

P-3: The WCSCR investigation along with the WCSCR intake form, included an allegation of complaint of pain due to handcuffs. However, this allegation was not specifically addressed in the recommended findings section of the WCSCR and should have been documented as a personnel complaint for neglect of duty. Additionally, during the detention, the deputy used profanity towards the minor. This allegation should have been added to the WCSCR investigation as a personnel complaint discourtesy, with a disposition of "Conduct Should Have Been Better."

Furthermore, during a telephone conversation with the watch commander, the R/P stated he had \$2,500. However, according to the WCSCR investigation, the deputy booked \$1,633 dollars. After reviewing the evidence, it was documented that \$1,631 dollars had been booked. Even though the money was being held as evidence, the investigator should have addressed the discrepancy between the amounts claimed and documented. This may have affected the outcome of the investigation.

P-4: All the allegations regarding discourtesy were identified in the narrative of the WCSCR investigation. The investigator concluded the disposition was “Conduct Appears Reasonable”; however, since the Involved employee and investigator agreed that a different approach could have been used, the disposition should have been “Conduct Should of Have Been Better.”

Recommendations

The AAB recommends the AV Stations command staff review all pertinent evidence regarding the intake of the complaint to ensure the investigating supervisors accurately document and investigate each significant allegation made by the complainant in the WCSCR investigation. It is further recommended that all BWC recordings and recorded telephone calls related to the WCSCR investigation are uploaded to the appropriate case in Evidence.com. This will ensure each level of review appropriately identifies and adjudicates each allegation. Additionally, the AAB recommends AV Station management conduct internal audits of completed WCSCR investigations to ensure WCSCR investigators identify every allegation and upload all pertinent data to Evidence.com.

Objective No. 1(f) – Misconduct Alleged in Civil Claims and Lawsuits

Criteria

There is no specific AV Compliance Metric for this objective. However, the Antelope Valley Settlement Agreement, Personnel Complaints, Complaint Classification, 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.

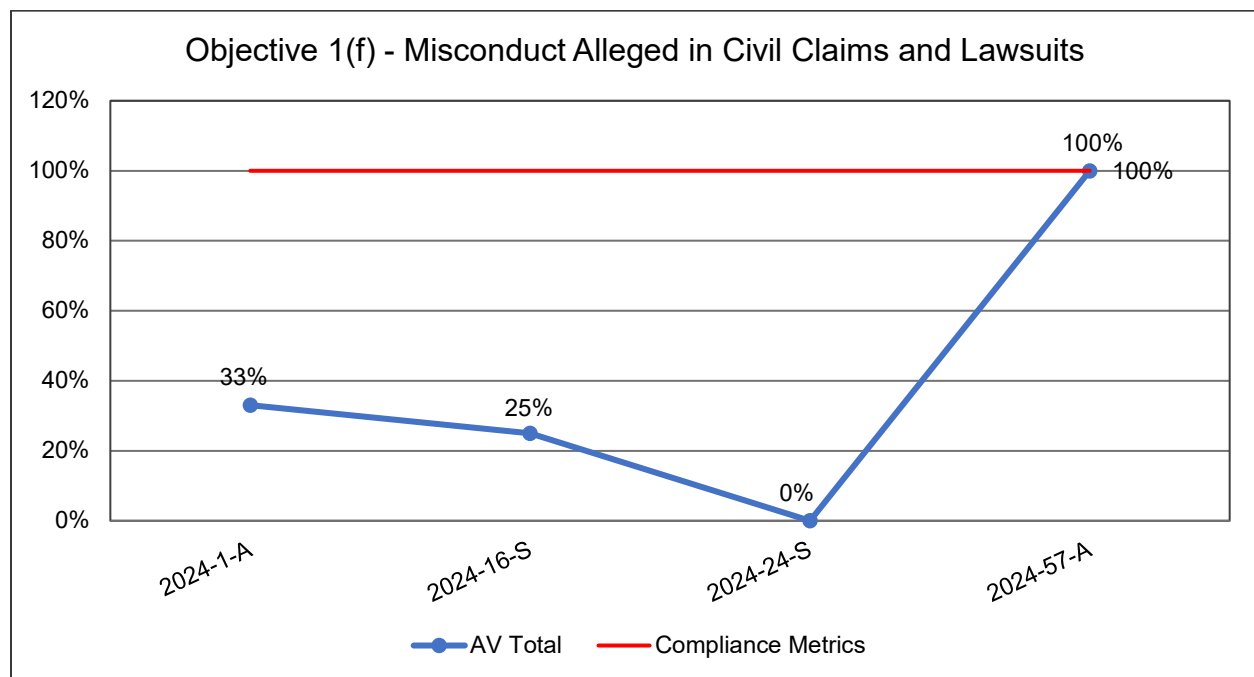
Public complaints can be discovered in different Department investigations or documentation. Those areas include UOF investigations, civil claims, and lawsuits. When the Department becomes aware of a significant allegation of misconduct by the public, a WCSCR investigation should be initiated to investigate and adjudicate the allegation.

Procedures

The auditors reviewed all the AV Stations’ civil claims and lawsuits filed during the audit period to determine whether allegations of misconduct were made and, if so, was a WCSCR investigation initiated. The auditors identified five civil claims that contained allegations of misconduct. No lawsuits were filed during the audit period.

The line graph below demonstrates that the AV Stations did not meet the established compliance metrics for Objective 1(e) in three of the four audits.

| Obj. No. | Audit Objectives | 2024-1-A | 2024-16-S | 2024-24-S | 2024-57-A | Compliance Metrics % |
|----------|--------------------------------------------------------|----------|-----------|-----------|-----------|----------------------|
| 1 | Initiating and Classifying Public Complaints | | | | | |
| 1(f) | <i>Misconduct Alleged in Civil Claims and Lawsuits</i> | 33% | 25% | 0% | 100% | 100% |



Findings

For the AV Stations combined, all three (100%) of the civil claims reviewed met the criteria for this objective because auditors determined AV Station supervisors identified allegations of misconduct in civil claims and initiated a WCSCR investigation.

For Lancaster, the one (100%) civil claims reviewed met the criteria for this objective because the auditors determined AV Station supervisors identified allegations of misconduct in civil claims and initiated a WCSCR investigation claim.

For Palmdale, both (100%) civil claims reviewed met the criteria for this objective because the auditors determined AV Station supervisors identified allegations of misconduct within the civil claims and initiated a WCSCR investigation and Administrative Investigation.

Recommendations

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

Objective No. 1(g) – Service Versus Personnel Complaints

Criteria

Antelope Valley Compliance Metrics, Paragraphs 128, 130, 131 (partial) & 140 (partial) (October 2019), Section 3B states:

- 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

The auditors evaluated twelve WCSCR investigative packets which were obtained from the AV Stations, as well as related audio and/or video files obtained from LASD.Evidence.com to determine whether these investigations were correctly categorized as personnel and/or service complaints during intake, resolution, and adjudication or if any corrections were made during the management review process.

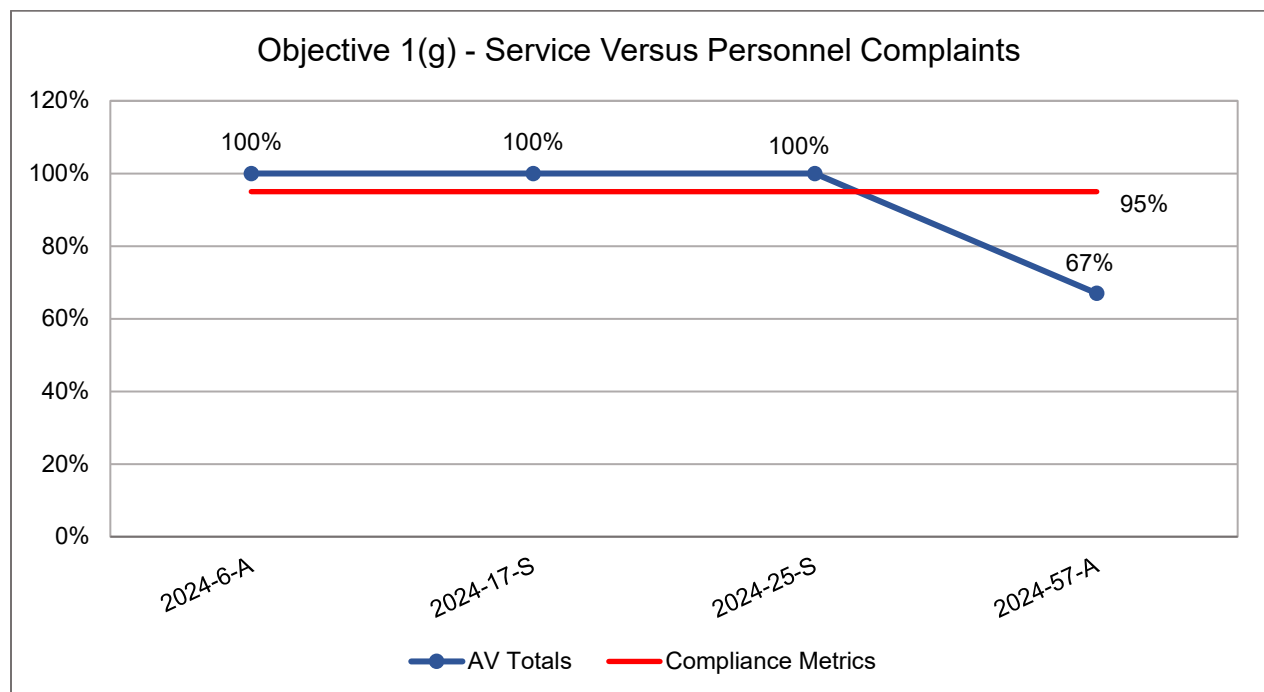
The SCR Handbook classifies complaints in the following way:

- 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.

The auditors compared the information; specifically, the allegation of misconduct alleged by the complainant, which was obtained from the intake interviews (audio and/or video) and email complaint forms for the WCSCR investigations, to the allegation of misconduct that was documented on the WCSCR form.

The line graph below demonstrates the AV Stations met the established compliance metrics for Objective 1(g) in the first three audits. However, there was a decline in compliance during the reassessment audit.

| Obj. No. | Audit Objectives | 2024-1-A | 2024-16-S | 2024-24-S | 2024-57-A | Compliance Metrics % |
|----------|-----------------------------------------------------|----------|-----------|-----------|-----------|----------------------|
| 1 | Initiating and Classifying Public Complaints | | | | | |
| 1(g) | <i>Service Versus Personnel Complaints</i> | 100% | 100% | 100% | 67% | 95% |



Findings

For the AV Stations combined, eight (67%) of the 12 WCSCR investigations reviewed met the criteria for this objective because the auditors determined AV Station supervisors correctly categorized each allegation as personnel and/or service complaints during intake, resolution, and adjudication.

For Lancaster, four (67%) of the six WCSCR investigations reviewed met the criteria for this objective because Lancaster Station supervisors correctly categorized each allegation. The remaining two (33%) did not meet the criteria because Lancaster Station supervisors did not correctly categorize each allegation.

For Palmdale, four (67%) of the six WCSCR investigations reviewed met the criteria for this objective because Palmdale Station supervisors correctly categorized each allegation. The remaining two (33%) did not meet the criteria because Palmdale Station supervisors did not correctly categorize each allegation.

Specifically:

L-5: The investigator properly classified the allegations as a personnel complaint for discourtesy, dishonesty, improper tactics, and neglect of duty for all three deputies. However, during a telephone conversation with the watch commander, the complainant stated he told the female deputy that video footage of the incident existed. Based on this statement made by the complainant, a personnel complaint for neglect of duty should have been documented specifically for the female deputy.

L-6: In the email complaint, the complainant alleged, "Lancaster Station captain ordered not to send us any help to our neighborhood." This specific allegation should have been documented in the WCSCR intake as a personnel complaint for neglect of duty, identifying the captain as an Involved Employee. Additionally, during a telephone conversation with the watch commander, the complainant stated the deputy assigned to work the desk ended their call by hanging up. This allegation was not addressed in the narrative portion of the WCSCR investigation; specifically, the recommended findings sections. This allegation should have been classified and documented as a personnel complaint for discourtesy.

P-3: All three allegations made by the complainant were properly classified as personnel complaints. However, during the detention, a female deputy used profanity towards the detained minor. This allegation should have been added to the WCSCR investigation as a personnel complaint for discourtesy. Additionally, the allegation regarding the minor's complaint of pain due to handcuffing was not explicitly addressed in the recommended findings section of the WCSCR investigation. This allegation should have been documented as a personnel complaint for neglect of duty for the female deputy.

P-4: All discourtesy allegations were properly classified as personnel complaints. However, the allegation that the deputy did not see the complainants window tint violation because her windows were down was not identified in the WCSCR intake as a service complaint for traffic citation or in WCSCR disposition. Even though the investigating supervisor addressed the allegations in the narrative portion of the WCSCR investigation, the fact that the window tint allegation was not appropriately documented affects the accuracy of the documentation in PRMS.

Recommendations

The AAB recommends the AV Stations' Operations staff carefully review all relevant information, including all BWC videos, to ensure each allegation is identified and properly classified.

Objective No. 1(h) – WCSCR Versus Administrative Investigation

Criteria

Antelope Valley Compliance Metrics, Personnel Complaints, IAB Referral, Paragraph 132 (October 2019), Section 2A states:

[LASD agrees to continue to require station commanders in the Antelope Valley to refer alleged incidents of misconduct to the IAB or ICIB for further investigation or review consistent with the Administrative Investigations Handbook...]

- a) *At least 95% of the complaints in an audit sample are handled in accordance with this SA provision.*

Procedures

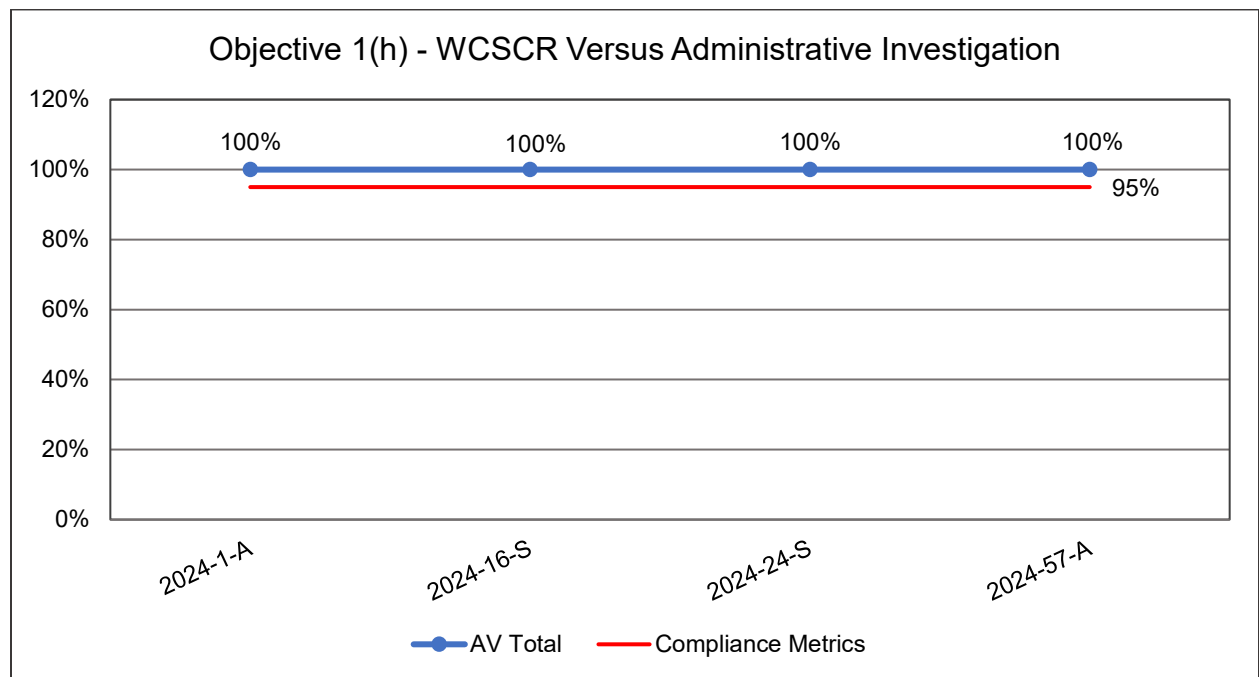
The Unit Commander is responsible for determining whether a public complaint should remain a WCSCR investigation, which excludes the imposition of discipline, or whether it should be investigated administratively or criminally, both of which can result in discipline.

The auditors evaluated twelve WCSCR investigative packets obtained from the AV Stations, as well as related audio and/or video files obtained from LASD.Evidence.com, to determine whether alleged incidents of misconduct were appropriately referred to the Internal Affairs Bureau (IAB) or the Internal Criminal Investigations Bureau (ICIB) for further investigation.

The AV Stations met the criteria for this objective if the auditors determined the AV Stations' commanders appropriately determined whether the WCSCR investigation needed to be referred to IAB or ICIB.

The line graph below demonstrates the AV Stations met the established compliance metrics for Objective 1(h) in all four of the audits.

| Obj. No. | Audit Objectives | 2024-1-A | 2024-16-S | 2024-24-S | 2024-57-A | Compliance Metrics % |
|----------|-----------------------------------------------------|----------|-----------|-----------|-----------|----------------------|
| 1 | Initiating and Classifying Public Complaints | | | | | |
| 1(h) | <i>WCSCR Versus Administrative Investigation</i> | 100% | 100% | 100% | 100% | 95% |



Findings

For AV Stations combined, all 12 (100%) of the WCSCR investigations reviewed met the criteria for this objective because the auditors concurred with AV Stations unit commanders that the allegations remained WCSCR investigations and were properly classified.

Recommendations

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

CONCLUSION

AV Stations did not meet the compliance metrics for seven of the eight applicable sub-objectives primarily because AV Stations supervisors did not take complaints when initially made aware of allegations of misconduct. In addition, the supervisors did not identify every allegation in the WCSCR investigations, leading to delays in the initiation of some complaints.

The evidence collected during this audit suggests the AV Station personnel and the Department must be mindful of areas needing improvement to comply with the stipulations set forth in the Agreement, compliance metrics, and Department policies. AAB believes addressing these findings will help ensure prompt corrective action for all sub-objectives which are out of compliance. When Department policies and procedures are not adhered to, it will result in an increased risk or an inability to be compliant.

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.

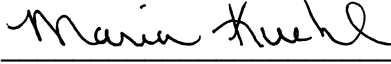
Objective No. 1 – Initiating and Classifying Public Complaints

- a) **Prompt Initiation of Complaint:** It is recommended the AV Stations' command staff create a corrective action plan to address station personnel who delay the initiation of a WCSCR investigation. These plans may include documenting the violations through corrective action counseling or an Administrative Investigation. Additionally, the AV Stations' command staff should ensure all supervisors are aware of and comply with the provisions outlined in the Service Comment Report (SCR) Handbook.
- b) **Discouraging or Inhibiting a Complaint:** It is recommended the AV Stations' command staff conduct briefings, along with documented (APIS rosters) training, to ensure their personnel are aware of the provisions in the Agreement, Department policy and SCR Handbook as they relate to the intake of public complaints. Furthermore, an appropriate corrective action plan must be created to address station personnel who have discouraged members of the public from filing a complaint. These violations of the Agreement must be documented in a memorandum to the NPD Chief for their consideration and disposition.
- c) **Watch Commander Initiate a WCSCR or Provide Justification in Watch Commander's Log:** The AAB recommends the AV Stations' command staff conduct weekly audits of the Watch Commander's log 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. It is further recommended the AV Stations' command staff contact the complainants from all three previous audits conducted by the AAB in which a WCSCR investigation was not initiated to accurately document and investigate the allegations.

- d) **Field Supervisors Documentation of Contacts that did not Constitute a Complaint:** It is imperative for AV Station supervisors to properly document their contacts with civilians. The AAB recommends the AV Stations' Operations Staff conduct weekly audits of field sergeants' MDC logs where the 777 clearance code was used to ensure they are properly documenting complaints and non-complaint incidents while out in the field as required by Palmdale Station Unit Order, 14-06 and Lancaster Station Unit Order, 69. These audits should be conducted by personnel assigned to work as the on duty watch commander and document the results in the Watch Commander's log. Furthermore, the AAB recommends the Department create a new, exclusive clearance code for instances a field supervisor contacts a member of the public regarding a potential complaint. This will allow AV Station management to easily track and differentiate between a citizen contact and a potential complaint.
- e) **Identify all Significant Allegations in a Complaint:** The AAB recommends the AV Stations command staff review all pertinent evidence regarding the intake of the complaint to ensure the investigating supervisors accurately document and investigate each significant allegation made by the complainant in the WCSCR investigation. It is further recommended that all BWC recordings and recorded telephone calls related to the WCSCR investigation are uploaded to the appropriate case in Evidence.com. This will ensure each level of review appropriately identifies and adjudicates each allegation. Additionally, the AAB recommends AV Station management conduct internal audits of completed WCSCR investigations to ensure WCSCR investigators identify every allegation and upload all pertinent data to Evidence.com.
- g) **Service versus Personnel Complaints:** The AAB recommends the AV Stations' Operations staff carefully review all relevant information, including all BWC videos, to ensure each allegation is identified and properly classified.

Views of Responsible Officials

On February 27, 2025, Palmdale Station command staff submitted a response concurring with some of the findings. On February 28, 2025, Lancaster Station command staff submitted a response concurring with the findings. The AAS presented the final audit report to the Division Director, Office of Constitutional Policing.

 12/19/2025

MARIA G. KUEHL DATE
Acting Captain
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