

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

AUDIT AND ACCOUNTABILITY BUREAU



Public Complaints Audit

Investigations and Management Review and Oversight of Public Complaints
Antelope Valley Stations
Project No. 2024-58-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 III of the Public Complaints audits, the auditors examined the investigation as well as the management review and oversight of public complaints to provide 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 ²
II	Initiating and Classifying of Public Complaints ³
III	Investigation and Management Review and Oversight of Public Complaints ⁴

For Part III of the Public Complaints audits, three audits were conducted (2024-6-A, 2024-17-A and 2024-25-A). However, two supplemental audits (2024-17-S and 2024-25-S) were later completed to address the compliance⁵ issues identified in previously mentioned audits.⁶

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

² For future audits, Part I will be titled, "Availability and Acceptance of Complaint Information and Initiation and Classification of Complaints."

³ For future audits, Part II will be titled, "Investigation of Public Complaints."

⁴ Per discussion with the MT, for future audits, Part III will be titled, "Adjudication of Public Complaints."

⁵ Compliance when mentioned throughout the report refers to whether the AV Stations met the established AV Agreement Compliance Metrics (compliance metrics).

⁶ Audits 2024-17-A was published on 06/27/2024 and 2024-25-A was published on 08/26/2024. The corresponding supplemental audits, 2024-17-S was published on 11/21/2024 and 2024-25-S was published on 12/05/2024.

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

The findings from both Lancaster and Palmdale Stations were incorporated into their respective supplemental audit reports (2024-17-S and 2024-25-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 – 6 – A	April 18, 2024	October 1, 2023, through December 31, 2023 ⁷
2024 – 17 – S	November 21, 2024	October 1, 2023, through December 31, 2023 ⁸
2024 – 25 – S	December 5, 2024	January 1, 2024, through March 31, 2024
2024-58-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. 2024-45-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 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).

⁷ 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 2024-6-A. As a result, AAB extended the audit period to January 1, 2023, through December 31, 2023, to identify completed WCSCR investigations.

⁸ Since the audit period for 2024-6-A was modified, the population for October 1, 2023, through December 31, 2023, was re-evaluated for 2024-17-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	INVESTIGATION OF COMPLAINTS				
1(a)	<i>Identify Everyone at the Scene</i>	50%	50%	50%	85%
1(b)	<i>Interviews Conducted Separately</i>	50%	83%	67%	85%
1(c)	<i>Interview Complainant In-Person</i>	67%	67%	67%	85%
1(d)	<i>Witness Interview Requirements</i>	100%	100%	100%	85%
1(e)	<i>Additional Interviews Conducted as Needed</i>	83%	83%	83%	85%
1(f)	<i>Limited English Proficiency (LEP)</i>	NIN ⁹	NIN	NIN	85%
1(g)	<i>Material Inconsistency Identified and Explained when Possible</i>	100%	100%	100%	85%
1(h)	<i>Record Entire Interview</i>	83%	100%	91%	92%
1(i)	<i>Uninvolved Investigator</i>	100%	100%	100%	90%
1(j)	<i>Collect All Evidence</i>	17%	50%	33%	95%
1(k)	<i>Thoroughness of Investigation</i>	17%	50%	33%	92%
2	MANAGEMENT REVIEW AND OVERSIGHT				
2(a)	<i>Statement Discarded due to Criminal History</i>	100%	100%	100%	85%
2(b)	<i>Deputy Statement Given Preference</i>	100%	67%	83%	85%
2(c)	<i>Preponderance of Evidence</i>	17%	50%	33%	95%
2(d)	<i>Timeliness of Adjudication - 60 Day Requirement</i>	0%	0%	0%	N/A ¹⁰
	<i>Timeliness of Adjudication - 90 Day Requirement</i>	0%	0%	0%	
2(e)	<i>Recordation of Critical Information on the Result of Service Comment Review (SCR) Form</i>	17%	50%	33%	95%
2(f)	<i>Recordation of Non-Critical Information on the Result of SCR Form</i>	100%	50%	75%	80%
2(g)	<i>Recordation of Critical Information in the Performance Recording and Monitoring System (PRMS)¹¹</i>	100%	100%	100%	95%
2(h)	<i>Recordation of Non-Critical Information in the PRMS</i>	67%	100%	83%	80%

⁹ NIN refers to "No Incidents Noted."

¹⁰ There is no applicable (N/A) compliance metrics for sub-objective 2(d), "Timeliness of Adjudication".

¹¹ 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 & Lawsuits, Discovery Motions, Employee Commendations, Preventable Traffic Collisions, Custody Complaints, and Special Conditions that the Department handles.

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

- Witness Interview Requirements
- Material Inconsistency Identified and Explained When Possible
- Uninvolved Investigator
- Statement Discarded Due to Criminal History
- Recordation of Critical Information in PRMS
- Recordation of Non-Critical Information in PRMS

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

The table on the following page summarizes the audit objectives and their corresponding compliance metrics findings from 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	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
1	INVESTIGATION OF COMPLAINTS					
1(a)	<i>Identify Everyone at the Scene</i>	50%	80%	50%	50%	85%
1(b)	<i>Interviews Conducted Separately</i>	83%	100%	100%	67%	85%
1(c)	<i>Interview Complainant In-Person</i>	50%	33%	25%	67%	85%
1(d)	<i>Witness Interview Requirements</i>	100%	90%	100%	100%	85%
1(e)	<i>Additional Interviews Conducted as Needed</i>	83%	90%	75%	83%	85%
1(f)	<i>Limited English Proficiency</i>	NIN	100%	NIN	NIN	85%
1(g)	<i>Material Inconsistency Identified and Explained when Possible</i>	100%	100%	100%	100%	85%
1(h)	<i>Record Entire Interview</i>	100%	100%	88%	91%	92%
1(i)	<i>Uninvolved Investigator</i>	100%	100%	100%	100%	90%
1(j)	<i>Collect All Evidence</i>	83%	80%	63%	33%	95%
1(k)	<i>Thoroughness of Investigation</i>	83%	80%	63%	33%	92%
2	MANAGEMENT REVIEW AND OVERSIGHT					
2(a)	<i>Statement Discarded due to Criminal History</i>	NIN	100%	100%	100%	85%
2(b)	<i>Deputy Statement Given Preference</i>	83%	100%	100%	83%	85%
2(c)	<i>Preponderance of Evidence</i>	83%	70%	63%	33%	95%
2(d)	<i>Timeliness of Adjudication - 60 Day Requirement</i>	0%	20%	13%	0%	N/A
	<i>Timeliness of Adjudication - 90 Day Requirement</i>	0%	0%	25%	0%	
2(e)	<i>Recordation of Critical Information on the Result of SCR Form</i>	83%	70%	63%	33%	95%
2(f)	<i>Recordation of Non-Critical Information on the Result of SCR Form</i>	50%	50%	63%	75%	80%
2(g)	<i>Recordation of Critical Information in the PRMS</i>	100%	100%	100%	100%	95%
2(h)	<i>Recordation of Non-Critical Information in the PRMS</i>	100%	100%	88%	83%	80%

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

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

**Part III of Public Complaints Audit:
Investigation and Management Review & Oversight of Public Complaints
Antelope Valley Stations
Project No. 2024-58-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 Justice¹² (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.

¹² [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 III of the Public Complaints Audit, the auditors conducted three audits (2024-6-A, 2024-17-A and 2024-25-A) to assess whether Department supervisors conducted thorough investigations which lead to reliable and well-supported conclusions, and to review management’s role in overseeing the investigative process, as well as in classifying and adjudicating complaints. However, two supplemental audits (2024-17-S and 2024-25-S) were later completed to address the compliance¹³ issues identified in previously mentioned audits.¹⁴ 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. 2024-45-A, outlining patterns, trends, and observations resulting from three prior audits for Part III – Investigation and Management Review & Oversight of 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. 2024-58-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.

¹³ Compliance when mentioned throughout the report refers to whether the AV Stations met the established AV Agreement Compliance Metrics (compliance metrics).

¹⁴ Audits 2024-17-A was published on 06/27/2024 and 2024-25-A was published on 08/26/2024. The corresponding supplemental audits, 2024-17-S was published on 11/21/2024 and 2024-25-S was published on 12/05/2024.

PART III OF PUBLIC COMPLAINTS AUDIT:
 INVESTIGATION AND MANAGEMENT REVIEW AND OVERSIGHT OF PUBLIC COMPLAINTS
 ANTELOPE VALLEY STATIONS
 PROJECT NO. 2024-58-A

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
<u>2024 – 6 – A</u>	April 18, 2024	October 1, 2023, through December 31, 2023 ¹⁵
<u>2024 – 17 – S</u>	November 21, 2024	October 1, 2023, through December 31, 2023 ¹⁶
<u>2024 – 25 – S</u>	December 5, 2024	January 1, 2024, through March 31, 2024
2024-58-A	–	April 1, 2024, through July 31, 2024

¹⁵ 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 2024-6-A. As a result, AAB extended the audit period to January 1, 2023, through December 31, 2023, to identify completed WCSCR investigations.

¹⁶ Since the audit period for 2024-6-A was modified, the population for October 1, 2023, through December 31, 2023, was re-evaluated for 2024-17-A/S.

OBJECTIVE, SCOPE, AND METHODOLOGY

Audit Scope and Criteria

The scope of this audit evaluated the aspects of the investigation and management review and oversight of public complaints. Additionally, if any patterns of professional misconduct, or discourtesies were observed, the auditors identified and reported the 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, specific to Part III of the Public Complaints Audits, was contingent upon the timely completion of investigations by the AV Stations. For this audit, the WCSCR investigations were considered completed 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.

The audit population and sample for this audit are provided below:

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 ¹⁷	41	6 ¹⁸	32 ¹⁹	6	6

¹⁷ Forty-two WCSCR investigations were initiated for Lancaster Station during the audit period. However, three of the 42 investigations were voided.

¹⁸ 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.

¹⁹ 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.

Audit Procedures

The auditors reviewed the compliance metrics related to public complaints, and examined the public complaint processes, material, and documents. This included completed WCSCR investigation packets obtained by the AV Stations as well as Body Worn Camera (BWC) and audio recordings obtained through the Digital Evidence Management System (DEMS), Evidence.com.²⁰ The auditors conducted detailed test work using audit tools designed to test the different audit objectives. The information was analyzed by the auditors and their findings were methodically recorded on audit work papers²¹ and subject to additional levels of review.

Summary of Findings

This audit consisted of two main objectives with 19 sub-objectives. However, there is no established compliance metrics for sub-objective 2(d), "Timeliness of Adjudication". As a result, 18 of the 19 sub-objectives were measured against the established compliance metrics.

The AV Stations were evaluated separately for each sub-objective. The results were combined to determine if they met the established compliance metrics. However, for sub-objective 2(g) – Recordation of Critical Information in the Performance Recording and Monitoring System (PRMS)²² and sub-objective 2(h) – Recordation of Non-Critical Information in the PRMS, the compliance rate is solely based on the Risk Management Bureau's Discovery Unit's compliance with the applicable criteria.

²⁰A secure, "Cloud" based storage system managed by the Department's Body Worn Camera Unit, externally hosted by the vendor, and available to authorized users. DEMS organizes, classifies, manages, views, shares, and archives digital evidence. The system also tracks and provides an extensive audit log of all activity to protect the chain of custody. Levels of access can be set and restricted within DEMS.

²¹ 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.

²² 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 & Lawsuits, Discovery Motions, Employee Commendations, Preventable Traffic Collisions, Custody Complaints, and Special Conditions that the Department handles.

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)	<i>Identify Everyone at the Scene</i>	50%	50%	50%	85%
1(b)	<i>Interviews Conducted Separately</i>	50%	83%	67%	85%
1(c)	<i>Interview Complainant In-Person</i>	67%	67%	67%	85%
1(d)	<i>Witness Interview Requirements</i>	100%	100%	100%	85%
1(e)	<i>Additional Interviews Conducted as Needed</i>	83%	83%	83%	85%
1(f)	<i>Limited English Proficiency (LEP)</i>	NIN ²³	NIN	NIN	85%
1(g)	<i>Material Inconsistency Identified and Explained when Possible</i>	100%	100%	100%	85%
1(h)	<i>Record Entire Interview</i>	83%	100%	91%	92%
1(i)	<i>Uninvolved Investigator</i>	100%	100%	100%	90%
1(j)	<i>Collect All Evidence</i>	17%	50%	33%	95%
1(k)	<i>Thoroughness of Investigation</i>	17%	50%	33%	92%
2	MANAGEMENT REVIEW AND OVERSIGHT				
2(a)	<i>Statement Discarded due to Criminal History</i>	100%	100%	100%	85%
2(b)	<i>Deputy Statement Given Preference</i>	100%	67%	83%	85%
2(c)	<i>Preponderance of Evidence</i>	17%	50%	33%	95%
2(d)	<i>Timeliness of Adjudication - 60 Day Requirement</i>	0%	0%	0%	N/A ²⁴
	<i>Timeliness of Adjudication - 90 Day Requirement</i>	0%	0%	0%	
2(e)	<i>Recordation of Critical Information on the Result of Service Comment Review (SCR) Form</i>	17%	50%	33%	95%
2(f)	<i>Recordation of Non-Critical Information on the Result of SCR Form</i>	100%	50%	75%	80%
2(g)	<i>Recordation of Critical Information in the Performance Recording and Monitoring System (PRMS)²⁵</i>	100%	100%	100%	95%
2(h)	<i>Recordation of Non-Critical Information in the PRMS</i>	67%	100%	83%	80%

²³NIN refers to "No Incidents Noted."

²⁴ There is no applicable (N/A) compliance metrics for sub-objective 2(d), "Timeliness of Adjudication".

²⁵ 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 & Lawsuits, Discovery Motions, Employee Commendations, Preventable Traffic Collisions, Custody Complaints, and Special Conditions that the Department handles.

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	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
1	INVESTIGATION OF COMPLAINTS					
1(a)	<i>Identify Everyone at the Scene</i>	50%	80%	50%	50%	85%
1(b)	<i>Interviews Conducted Separately</i>	83%	100%	100%	67%	85%
1(c)	<i>Interview Complainant In-Person</i>	50%	33%	25%	67%	85%
1(d)	<i>Witness Interview Requirements</i>	100%	90%	100%	100%	85%
1(e)	<i>Additional Interviews Conducted as Needed</i>	83%	90%	75%	83%	85%
1(f)	<i>Limited English Proficiency</i>	NIN	100%	NIN	NIN	85%
1(g)	<i>Material Inconsistency Identified and Explained when Possible</i>	100%	100%	100%	100%	85%
1(h)	<i>Record Entire Interview</i>	100%	100%	88%	91%	92%
1(i)	<i>Uninvolved Investigator</i>	100%	100%	100%	100%	90%
1(j)	<i>Collect All Evidence</i>	83%	80%	63%	33%	95%
1(k)	<i>Thoroughness of Investigation</i>	83%	80%	63%	33%	92%
2	MANAGEMENT REVIEW AND OVERSIGHT					
2(a)	<i>Statement Discarded due to Criminal History</i>	NIN	100%	100%	100%	85%
2(b)	<i>Deputy Statement Given Preference</i>	83%	100%	100%	83%	85%
2(c)	<i>Preponderance of Evidence</i>	83%	70%	63%	33%	95%
2(d)	<i>Timeliness of Adjudication - 60 Day Requirement</i>	0%	20%	13%	0%	N/A
	<i>Timeliness of Adjudication - 90 Day Requirement</i>	0%	0%	25%	0%	
2(e)	<i>Recordation of Critical Information on the Result of SCR Form</i>	83%	70%	63%	33%	95%
2(f)	<i>Recordation of Non-Critical Information on the Result of SCR Form</i>	50%	50%	63%	75%	80%
2(g)	<i>Recordation of Critical Information in the PRMS</i>	100%	100%	100%	100%	95%
2(h)	<i>Recordation of Non-Critical Information in the PRMS</i>	100%	100%	88%	83%	80%

Detailed Findings

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

Objective No. 1 – Investigation of Complaints

This objective evaluated the investigation of public complaints.

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 & 137 (October 2019), Section 3B (5) states:

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

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.*

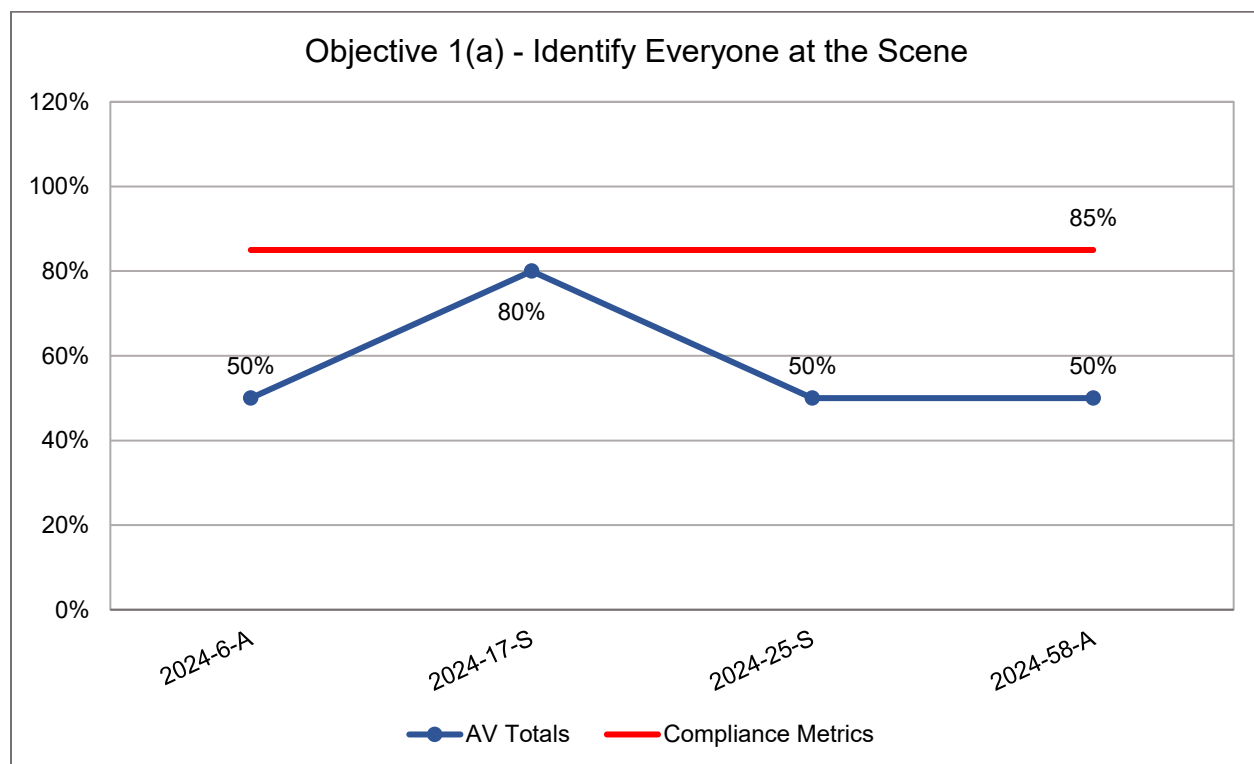
Procedures

The auditors reviewed the Reporting Party, Involved Department member, and Civilian and Department member Witness information sections of the WCSCR and the Service Comment Review for each investigation and compared them to the corresponding BWC recordings, audio recordings, and images, as well as the narrative portion of the Service Comment Review to ensure all persons at the scene of the incident were identified. If a person at the scene was not identified, the auditors determined if a detailed justification was documented in the Service Comment Review as to why the person was not identified.

The auditors also verified whether investigators identified all Department members and witnesses who were at the scene but asserted they did not witness or were not involved in the incident. If such assertions appeared unsupported by the evidence, the auditors evaluated whether the investigator conducted further investigation.

The line graph below demonstrates the AV Stations had a compliance increase in the second audit. However, there was a decrease in compliance in the third audit which remained consistent in this audit. The AV Stations did not meet the established compliance metrics for Objective 1(a) in all four audits.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
1	INVESTIGATION OF COMPLAINTS					
1(a)	<i>Identify Everyone at the Scene</i>	50%	80%	50%	50%	85%



Findings

For the AV Stations combined, six (50%) of the 12 WCSCR investigations reviewed met the criteria for this objective because everyone at the scene was identified. The remaining six (50%) investigations did not meet the criteria for this objective because not all Department members and/or witnesses at the scene were identified.

For Lancaster Station, three (50%) of the six WCSCR investigations reviewed met the criteria for this objective because everyone at the scene was identified. The remaining three (50%) investigations did not meet the criteria because not all Department members or witnesses at the scene were identified.

For Palmdale Station, three (50%) of the six WCSCR investigations reviewed met the criteria for this objective because everyone at the scene was identified. The remaining three (50%) investigations did not meet the criteria because not all Department members and/or witnesses at the scene were identified.

Specifically:

L-2²⁶: The complainant alleged, via telephone, during a traffic stop, a Department member unlawfully searched her vehicle, improperly had everyone exit the vehicle, was discourteous, harassed her, and broke the glove compartment box of her vehicle. When reviewing the corresponding BWC recordings, the auditors noted three individuals present at the incident during the time the alleged allegations took place. However, they were not identified in the Civilian Witness information section of the WCSCR or Service Comment Review. One of the individuals was the complainant's adult son.

L-4²⁷: The complainant alleged, via her organization's Instagram page, a Lancaster Station's Baker to Vegas t-shirt depicted images "identical to a known cowboy deputy gang." During the review, the auditors noted a Department member was documented as a witness on the WCSCR and was interviewed regarding the complaint. However, the Department member was not identified in the Employee Witness information section of the Service Comment Review. In addition, a civilian witness whose name was documented on the t-shirt interest list at Lancaster Station was not identified as a witness in the Civilian Witness information section of the WCSCR or the Service Comment Review.

L-5: The complainant alleged, in-person at Lancaster Station, during a call for service, Department members present at the incident did not arrest the roommate who allegedly tried to stab him and laughed at him when he complained. He also stated the Department members did not obtain video footage he claimed was relevant to the incident. When reviewing the corresponding BWC recordings, the auditors noted three individuals at the incident during the time the alleged allegations took place. However, they were not identified in the Civilian Witness information section of the WCSCR or the Service Comment Review. The individuals were the roommate that allegedly tried to stab him, the roommate's wife, and the roommate's mother.

²⁶L refers to Lancaster Station. The number represents the sample being referred to of the six WCSCR investigations reviewed for Lancaster Station.

²⁷ Based on the nature of the complaint, the Office of Constitutional Policing concurred with the adjudication of the WCSCR investigation.

P-2²⁸: The complainant alleged, in-person at Lancaster Station, during a traffic stop, her son was harassed, racially profiled, and discriminated against by Department members. She also alleged, while her son was at the Palmdale Station jail, Department members stated they hoped he had a gun in his vehicle. The complainant felt the statement was inappropriate. When reviewing the corresponding BWC recordings, the auditors noted an individual at the incident during the time the alleged allegations took place. However, he was not identified in the Civilian Witness information section of the WCSCR or the Service Comment Review. The individual was the complainant's other adult son. The auditors also noted a Department member was documented on the Incident Report as being present at the incident. However, the Department member was not identified in the Employee Witness information section of the WCSCR or the Service Comment Review.

P-3: The complainant alleged, via e-mail, during a traffic stop, he was falsely arrested. He also complained the handcuffs were on too tight, he was missing property, and he was racially profiled. When reviewing the corresponding BWC recordings, the auditors noted an individual at the incident during the time the alleged allegations took place. However, she was not identified in the Civilian Witness information section of the WCSCR or the Service Comment Review. The individual was an acquaintance of the complainant.

P-6: The complainant alleged, via telephone, during a call for service regarding a child custody exchange, she informed the Department member she had an open case with the Department of Children and Family Services (DCFS) alleging her son's father abused their son. She also informed the Department member that DCFS recommended the child stay with her pending the outcome of the investigation. However, the Department member stated he could not do anything further to assist her except to allow the child to go with the father, as a condition of their custody agreement. When reviewing the corresponding BWC recordings, the auditors noted the son, the neighbor's daughter, and a few acquaintances of the complainant's son's father were present at the incident during the time the alleged allegations took place. However, they were not identified in the Civilian Witness information section of the WCSCR or the Service Comment Review.

Recommendations

It is recommended proper identification of all individuals at the incident scene be documented on the WCSCR, Service Comment Review, and a complaint investigation checklist. This checklist should be created by the Compliance Unit and utilized during the WCSCR investigation. It should detail the requirements of the Agreement and the compliance metrics. Additionally, Department policy requirements should be added as necessary. This checklist should be available to both AV Stations and required for each WCSCR investigation. It should remain attached to the investigation package and be evaluated during the management review and oversight process.

²⁸ P refers to Palmdale Station. The number represents the sample being referred to of the six WCSCR investigations reviewed for 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 & 137 (October 2019), Section 3B (1) states:

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

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:

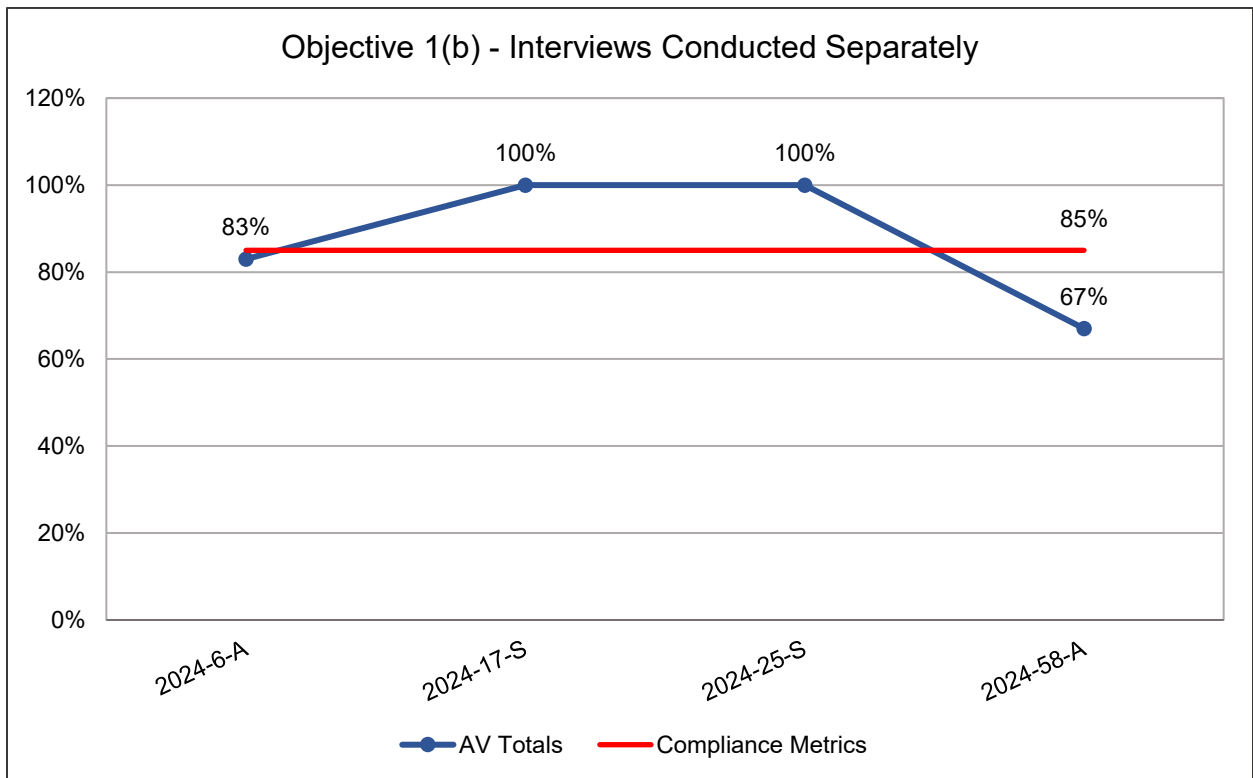
1. *All interviews are conducted separately.*

Procedures

The auditors reviewed the complainant and civilian interview recordings for each of the investigations and determined if any other involved Department members, including Department member witnesses, were present during the interview. The auditors reviewed the involved and witness Department member statements from the corresponding Service Comment Review for each investigation and verified whether the investigator documented the interviews were conducted separately. For instances when an interview was not conducted separately, the auditors determined if a detailed justification was documented in the Service Comment Review. The justification had to include who the individual was and why their presence during the interview was justified.

The line graph below demonstrates the AV Stations had a compliance increase to 100% in the second audit and remained consistent in the third audit. However, there was a decrease in compliance in this audit. The AV Stations met the established compliance metrics for Objective 1(b) in the second audit and the third audit. However, the AV Stations did not meet the established compliance metrics in the first audit and this audit.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
1	INVESTIGATION OF COMPLAINTS					
1(b)	<i>Interviews Conducted Separately</i>	83%	100%	100%	67%	85%



Findings

For the AV Stations combined, eight (67%) of the 12 WCSCR investigations reviewed met the criteria for this objective because all interviews were conducted separately. The remaining four (33%) investigations did not meet the criteria for this objective because the interviews were not conducted separately or, based on the information provided, it could not be determined if the interview was conducted separately.

For Lancaster Station, three (50%) of the six WCSCR investigations reviewed met the criteria for this objective because all interviews were conducted separately. The remaining three (50%) investigations did not meet the criteria because the interviews were not conducted separately or, based on the information provided, could not be determined if the interview was conducted separately.

For Palmdale Station, five (83%) of the six WCSCR investigations reviewed met the criteria for this objective because all interviews were conducted separately. The remaining (17%) investigation did not meet the criteria because, based on the information provided, it could not be determined if the interview was conducted separately.

Specifically:

L-2: When reviewing the recording of the complainant's interview and the civilian witness' interview with the investigator, the auditors noted the interviews were not conducted separately, as both witnesses were present during each other's interviews.

L-4: The auditors could not determine if the interview with the complainants was conducted separately from other parties involved with the incident. The investigator did not document in the Service Comment Review whether the interview was conducted separately.

L-6: The complainant alleged, via e-mail, during a call for service regarding a citizen assist, the Lancaster Station Captain ordered Department members not to respond to the call for service. The complainant stated the Lancaster Station Captain's decision was inhuman. He also complained the call taker was rude. When reviewing the recording of the complainant's interview and the civilian witness' interview with the investigator, the auditors noted the interviews were not conducted separately, as both witnesses were present during each other's interviews.

P-2: The auditors could not determine if the interview with the involved party, the complainant's son, was conducted separately from other parties involved with the incident. The investigator asked the involved party if anyone was present with him during the interview. The involved party explained people were present. However, the investigator did not question if any of those individuals were also present at the incident that led to the complaint.

Recommendations

To ensure compliance metrics are met, all investigative interviews must be conducted separately and documented within the investigation. This will allow the reporting and involved parties, witnesses, and involved deputies the opportunity to speak freely and honestly about the details of the complaint and provide critical information. It is recommended the justification as to why an interview was not conducted separately be documented on the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a).

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

Criteria

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

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

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.

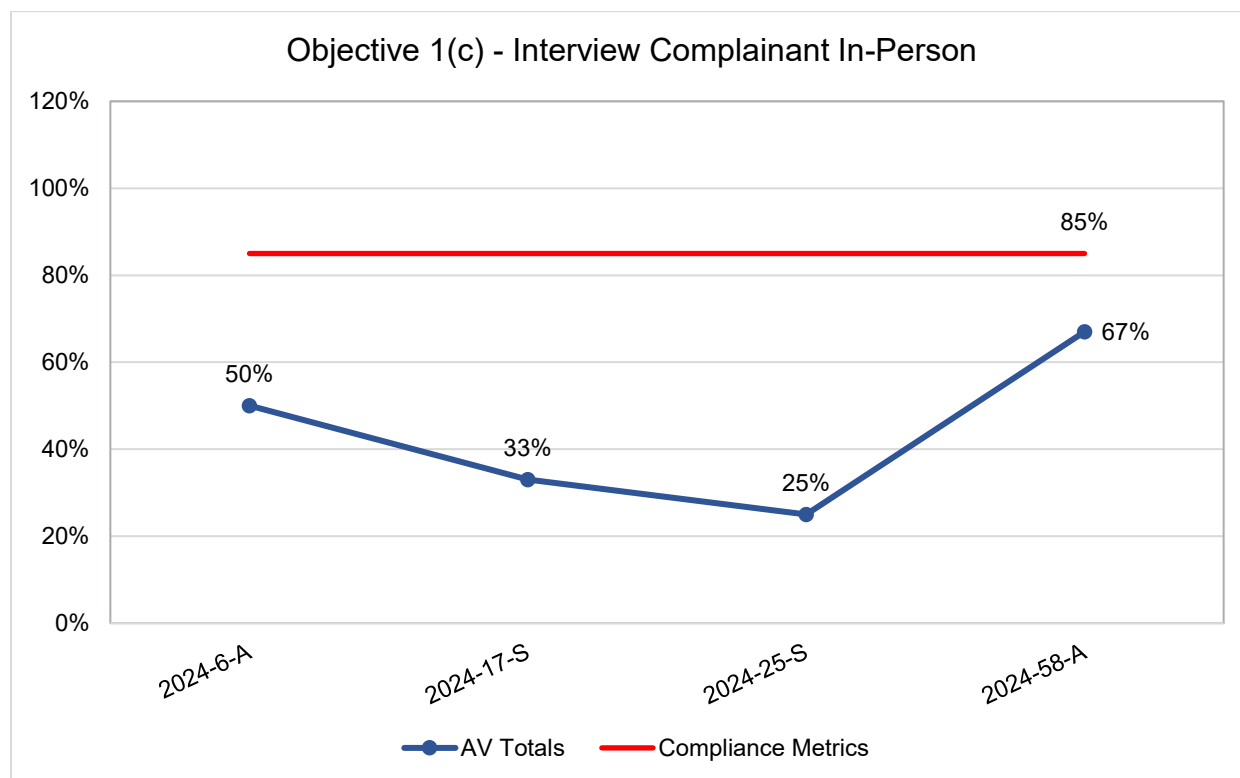
The MT and DOJ have agreed the investigator may rely on the complainant's recorded intake interview provided it was thorough and addressed all the issues. Per the MT, the investigator must specifically document the reason why it was not practical to conduct an in-person interview in the Service Comment Review. If the complainant declines the in-person interview, the investigator can document this as justification for not conducting an in-person interview.

Procedures

The auditors reviewed all the complainant interview recordings and determined whether each interview was conducted in-person. The auditors also reviewed the corresponding Service Comment Review to determine if the investigator documented whether the complainant was interviewed in-person when practical or explained why it was not practical to interview the complainant in-person.

The line graph below demonstrates the AV Stations had a compliance decrease in the second audit and the third audit. However, there was an increase in compliance in this audit. The AV Stations did not meet the established compliance metrics for Objective 1(c) in all four audits.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
1	INVESTIGATION OF COMPLAINTS					
1(c)	<i>Interview Complainant In-Person</i>	50%	33%	25%	67%	85%



Findings

For the AV Stations combined, eight (67%) of the 12 WCSCR investigations reviewed met the criteria for this objective because all complainant interviews were conducted in-person. The remaining four (33%) investigations did not meet the criteria for this objective because the complainants were not interviewed in-person, and the investigators did not provide the reason why it was not practical to interview the complainant in-person.

For Lancaster Station, four (67%) of the six WCSCR investigations reviewed met the criteria for this objective because all complainant interviews were conducted in-person. The remaining two (33%) investigations did not meet the criteria because the complainants were not interviewed in-person, and the investigators did not provide the reason why it was not practical to interview the complainant in-person.

For Palmdale Station, four (67%) of the six WCSCR investigations reviewed met the criteria for this objective because all complainant interviews were conducted in-person. The remaining two (33%) investigations did not meet the criteria because the complainants were not interviewed in-person, and the investigators did not provide the reason why it was not practical to interview the complainant in-person.

Specifically:

L-2, L-5, and P-3: The investigator did not document in the Service Comment Review the reason the complainant was not interviewed in-person.

P-5: The complainant alleged, via telephone, during a battery call for service, the Department member did not complete an investigation, refused to take information, refused to identify himself or provide a business card, and discriminated against him. During the review, the auditors noted the investigator did not document in the Service Comment Review the reason it was not practical to interview the complainant in-person.

Recommendations

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

Objective No. 1(d) – Witness Interview Requirements

Criteria

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

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

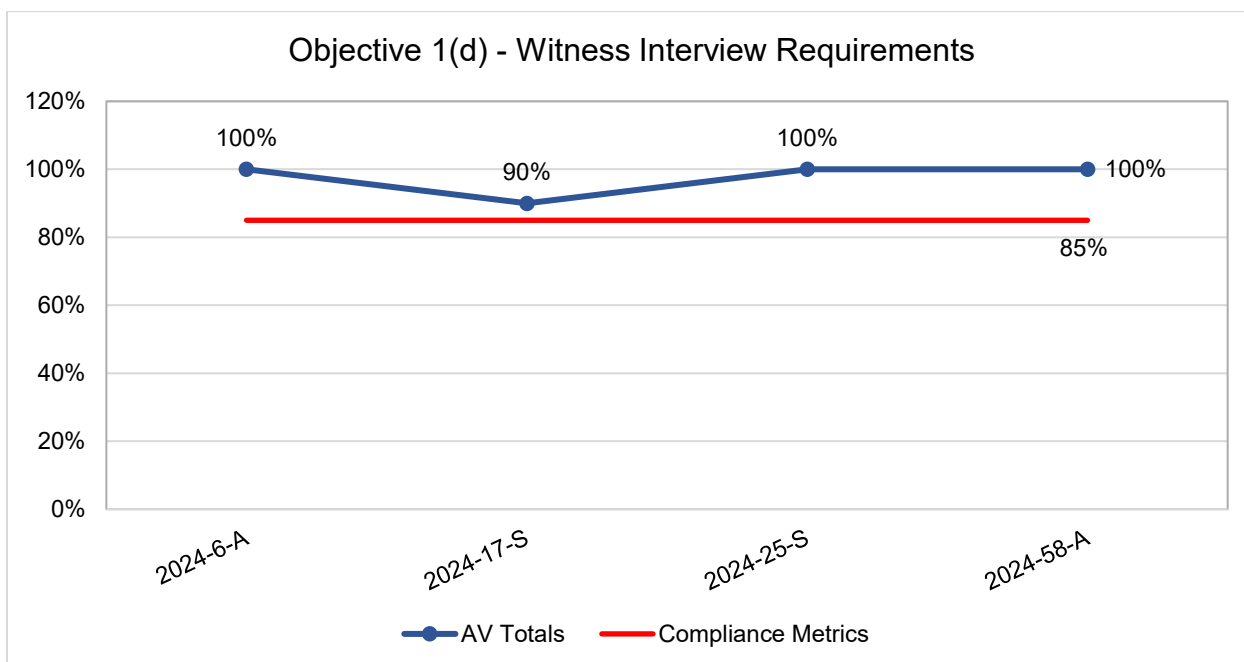
Per the MT, if a witness' role in the complaint was not materially impactful and the BWC recording captured the incident, the auditors are given considerable latitude to determine the necessity of this witness interview.

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 recordings and complainant and civilian witness interviews. Furthermore, the auditors reviewed the involved and witness Department member statements. The auditors verified whether written statements or interview recordings were available for all Department and non-Department witnesses that played an impactful role in the complaint. For all witnesses who played a minor role in the complaint, the auditors determined if a written statement, interview recording, or a detailed justification explaining why a statement or interview was not required had been documented in the Service Comment Review.

The line graph below demonstrates the AV Stations had a decrease in compliance in the second audit. However, there was an increase in compliance to 100% in the third audit and it remained at 100% in this audit. The AV Stations met the established compliance metrics for Objective 1(d) in all four audits.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
1	INVESTIGATION OF COMPLAINTS					
1(d)	<i>Witness Interview Requirements</i>	100%	90%	100%	100%	85%



Findings

For the AV Stations combined, all 12 (100%) WCSCR investigations reviewed met the criteria for this objective because for the six investigations where Department and/or non-Department witnesses were not interviewed, BWC recordings were available to support what occurred at the incident.

For Lancaster Station, all six (100%) WCSCR investigations reviewed met the criteria for this objective because for the four investigations where Department or non-Department witnesses were not interviewed, BWC recordings were available to support what occurred at the incident.

For Palmdale Station, all six (100%) WCSCR investigations reviewed met the criteria for this objective because for the two investigations where Department and/or non-Department witnesses were not interviewed, BWC recordings were available to support what occurred at the incident.

Recommendations

There are no recommendations because the AV Stations met the established compliance metrics.

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 & 137 (October 2019), Section 3B (3) states:

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

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.

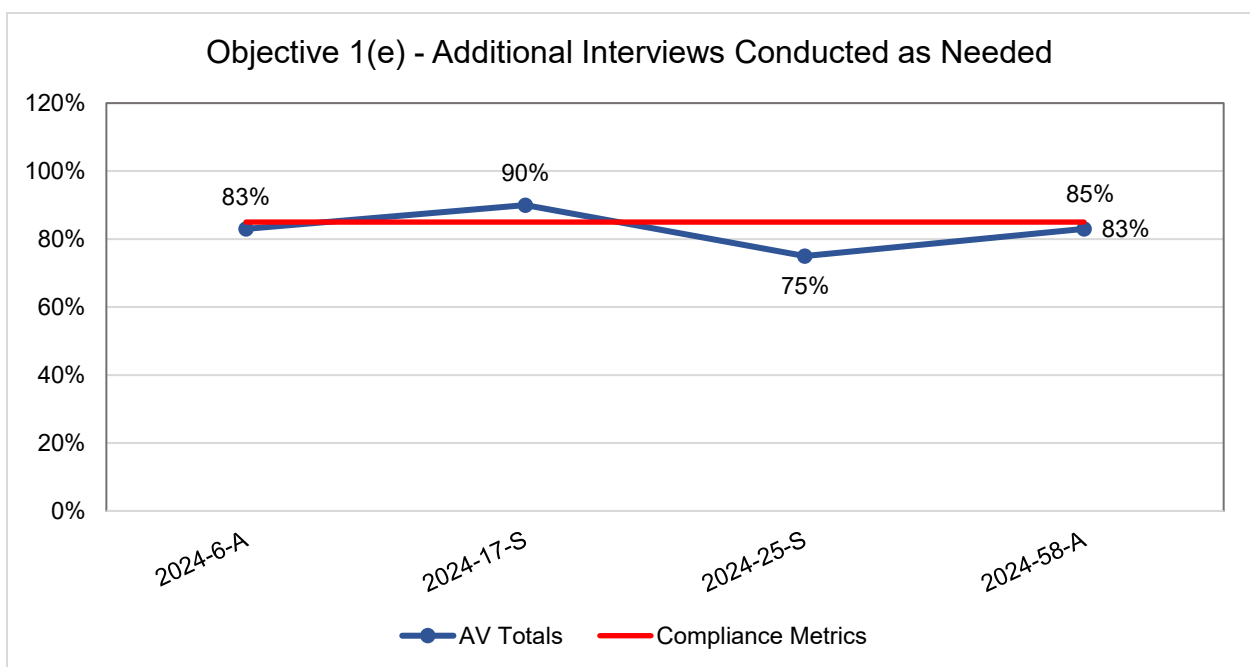
Per the MT, the criteria can also be met if additional interviews were not required, as it demonstrates a thorough investigation was completed. The MT also stated if a person, except for the complainant, is not interviewed but the investigation was sufficient to reach reliable and complete findings, additional interviews are not required for compliance.

Procedures

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

The line graph below demonstrates the AV Stations had an increase in compliance in the second audit. However, there was a decrease in compliance in the third audit followed by an increase in this audit. The AV Stations met the established compliance metrics for Objective 1(e) in the second audit. However, the AV Stations did not meet the established compliance metrics in the first audit, third audit, or this audit.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
1	INVESTIGATION OF COMPLAINTS					
1(e)	<i>Additional Interviews Conducted as Needed</i>	83%	90%	75%	83%	85%



Findings

For the AV Stations combined, 10 (83%) of the 12 WCSCR investigations reviewed met the criteria for this objective because additional interviews were not necessary to reach reliable and complete findings. The remaining two (17%) investigations did not meet the criteria for this objective because additional interviews necessary to reach reliable and complete findings were not conducted.

For Lancaster Station, five (83%) of the six WCSCR investigations reviewed met the criteria for this objective because additional interviews were not necessary to reach reliable and complete findings. The remaining one (17%) investigation did not meet the criteria because additional interviews necessary to reach reliable and complete findings were not conducted.

For Palmdale Station, five (83%) of the six WCSCR investigations reviewed met the criteria for this objective because additional interviews were not necessary to reach reliable and complete findings. The remaining one (17%) investigation did not meet the criteria because additional interviews necessary to reach reliable and complete findings were not conducted.

Specifically:

L-2: Regarding the complainant's allegation the Department member broke the glove compartment box of her vehicle, the investigator determined the Department member's conduct appeared reasonable. However, per the BWC recording, as a result of how the Department member opened the door of the glove compartment box, it came off the hinges, and then the Department member moved it back into place and shut the glove compartment box. As a result, the auditors could not determine if the glove compartment box was or was not broken. An additional interview with the complainant was necessary to request additional information such as pictures of the glove compartment box to verify it was not broken, which would support the disposition for this allegation.

P-3: Regarding the complainant's allegation the handcuffs placed on him were too tight, the investigator determined the conduct of the Department member that handcuffed the complainant appeared reasonable. However, based on the BWC recording and supporting documentation, the auditors could not determine if the handcuffs were adjusted. An additional interview with the complainant and the Department member was necessary to determine if the handcuffs were adjusted to support the disposition for this allegation. The complainant also alleged he was missing property. The complainant alleged he had \$2,500 with him during the incident. The complainant was informed the money was being held as evidence. However, per the Service Comment Review, a lesser amount was booked as evidence. Additional interviews were necessary to determine what occurred with the remaining money the complainant alleged he had.

Recommendations

It is recommended investigators always conduct and document the additional interviews needed to ensure that all the necessary information is collected and supported by sufficient and reliable sources in the Service Comment Review and on the complaint investigation checklist as recommended in Objective 1(a).

Objective No. 1(f) – Limited English Proficiency

Criteria

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

3. *LASD will be deemed in substantial outcomes compliance when: ...*
 - 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 role in the complaint was not materially impactful, there is latitude regarding the interpreter used. However, an interpreter not involved in the underlying complaint must be used when interviewing an LEP complainant and all LEP material witnesses.

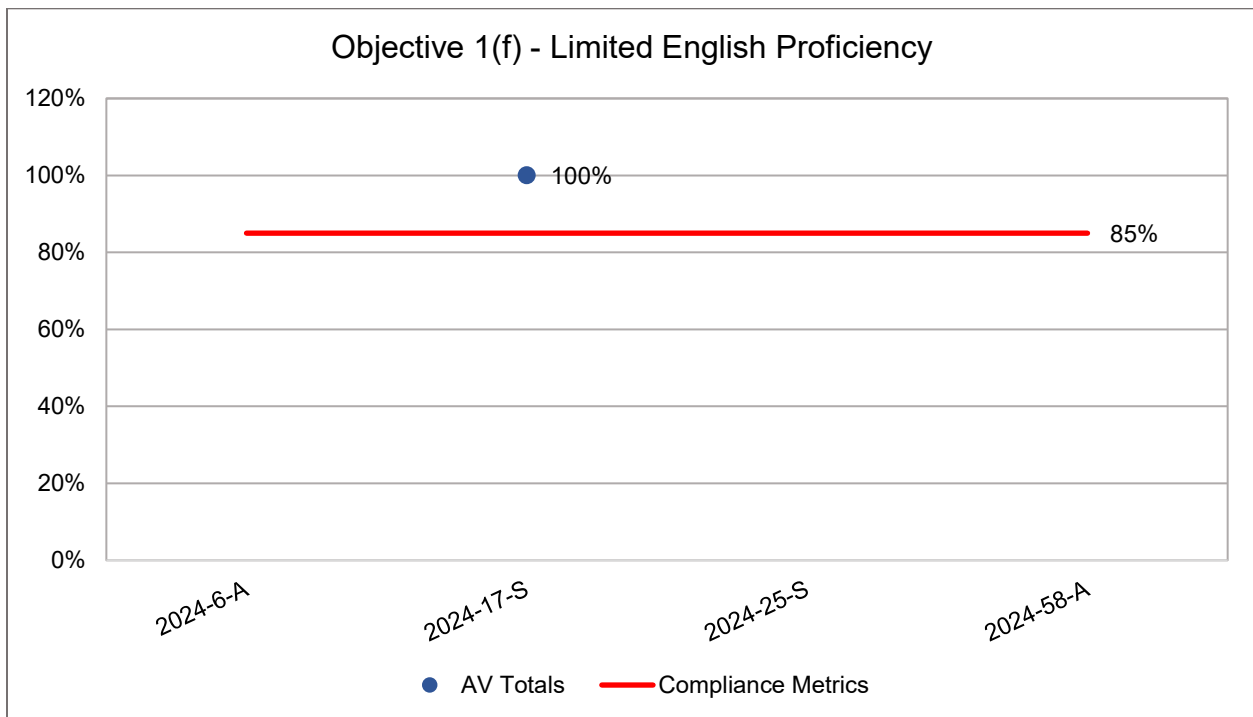
Procedures

The auditors reviewed the complainant and the civilian witness interview recordings and determined whether any of the complainants or witnesses needed an interpreter. If so, the auditors determined whether an interpreter not involved in the underlying complaint was utilized to obtain a statement or interview all LEP complainants and material witnesses.

For instances when an interpreter involved in the underlying complaint was utilized to obtain a statement or interview an LEP witness that played a minor role in the complaint, the auditors determined whether a detailed justification was documented in the Service Comment Review as to why a Department member involved with the complaint was utilized.

The line graph below demonstrates the AV Stations were 100% compliant in the second audit and met the established compliance metrics for Objective 1(f). No incidents were noted in the remaining three audits.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
1	INVESTIGATION OF COMPLAINTS					
1(f)	<i>Limited English Proficiency</i>	NIN	100%	NIN	NIN	85%



Findings

For the AV Stations combined, no LEP complainants or witnesses were noted for the 12 WCSCR investigations reviewed. As a result, an interpreter was not required. Therefore, the compliance rate is “NIN,” as no incidents pertained to the criteria.

Recommendations

There are no recommendations because no incidents applicable to this objective were noted.

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

Criteria

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

3. *LASD will be deemed in substantial outcomes compliance when: ...*
 - 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 just conflicting witness statements. Material inconsistencies may include conflicting statements between the complainant, involved deputies, and/or witnesses, as well as conflicting information noted between other evidence including BWC recordings and investigative documentation.

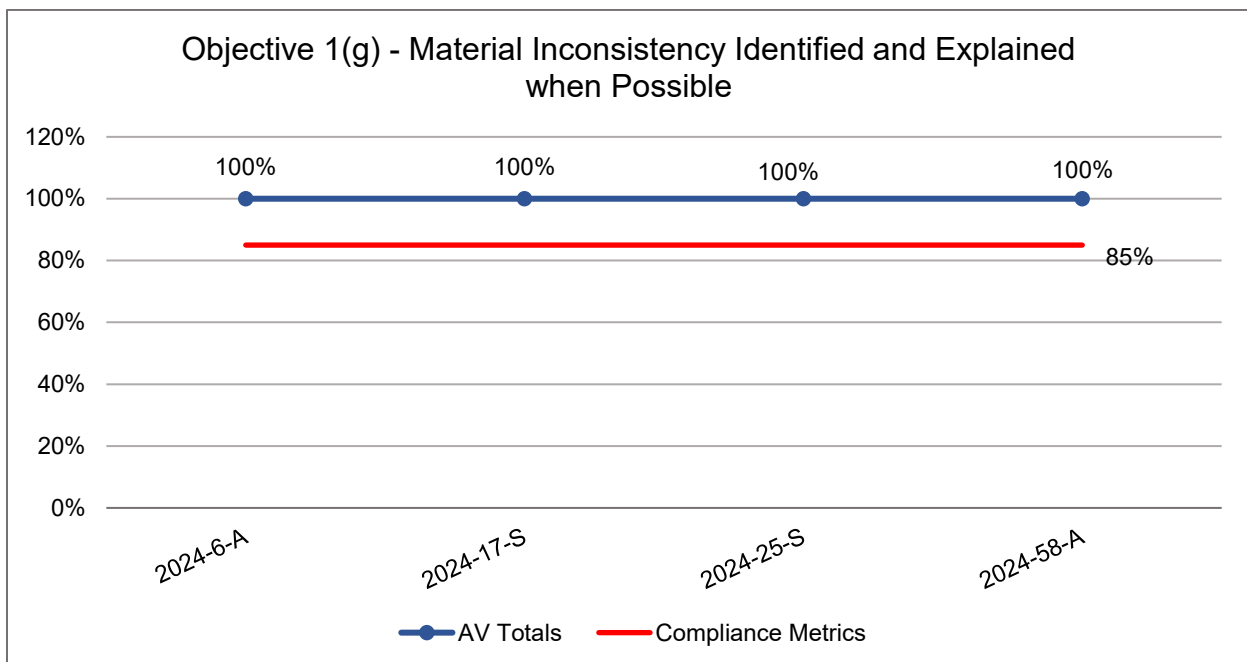
Additionally, per the MT, the criteria can be met if material inconsistencies were not noted, as it demonstrates a thorough investigation was completed.

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 recordings and complainant and civilian witness interviews. Furthermore, the auditors reviewed the involved and witness Department member statements. The auditors noted when an investigation contained material inconsistencies between the complainant, civilian witness, and involved and witness Department member statements, as well as between the BWC recordings and investigative documentation, and if efforts to resolve those inconsistencies were documented in the Service Comment Review.

The line graph below demonstrates the AV Stations were 100% compliant for all four audits. As a result, the AV Stations met the established compliance metrics for Objective 1(g) in all four audits.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
1	INVESTIGATION OF COMPLAINTS					
1(g)	<i>Material Inconsistency Identified and Explained when Possible</i>	100%	100%	100%	100%	85%



Findings

For the AV Stations combined, all 12 (100%) WCSCR investigations reviewed met the criteria for this objective because no material inconsistencies were noted.

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

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

Recommendations

There are no recommendations because the AV Stations met the established compliance metrics.

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.

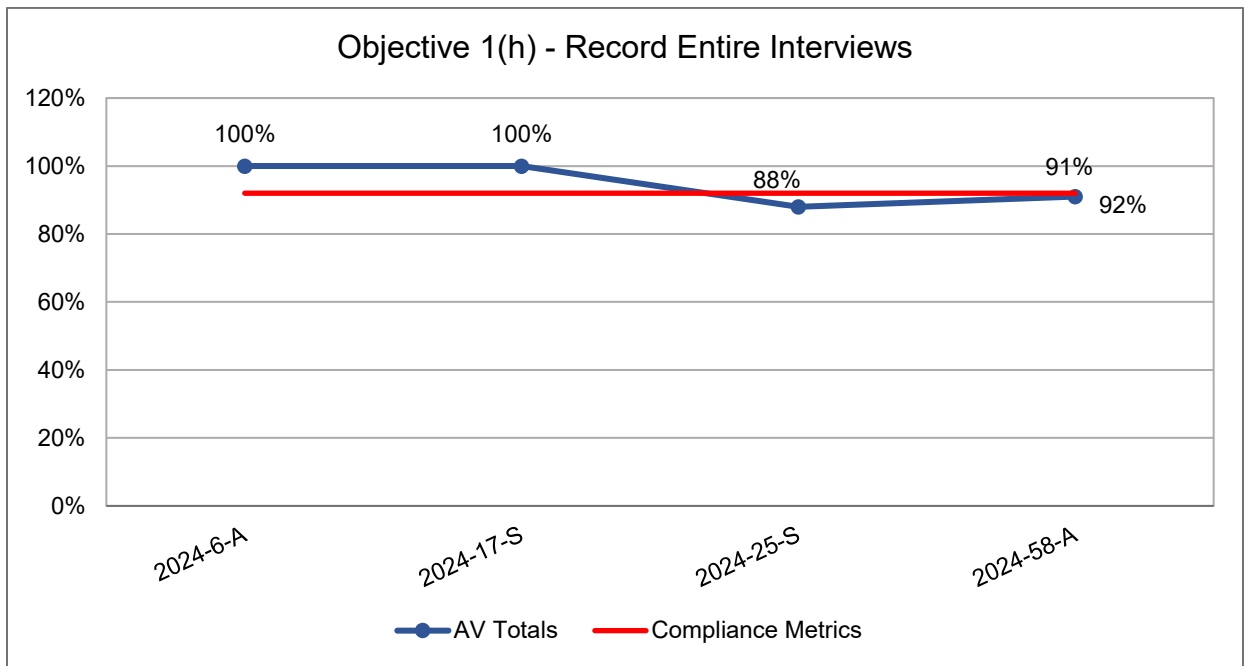
Subsequent to the completion of the MTs Second Audit of Community Complaints, the Department agreed to adopt the compliance metric of 92%.

Procedures

The auditors reviewed the complainant interview recordings and determined if each interview was recorded in its entirety. For any interviews that were not recorded in their entirety, the auditors reviewed the Service Comment Review to determine if the investigator documented why the complainant's interview was not recorded in its entirety.

The line graph below demonstrates the AV Stations were 100% compliant in the first audit and second audit. However, there was a decrease in compliance in the third audit and then an increase in this audit. The AV Stations met the established compliance metrics for Objective 1(h) in the first audit and second audit. However, the AV Stations did not meet the established compliance metrics in this and the third audit.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
1	INVESTIGATION OF COMPLAINTS					
1(h)	<i>Record Entire Interviews</i>	100%	100%	88%	91%	92%



Findings

For the AV Stations combined, 10 (91%) of the 11 WCSCR investigations reviewed met the criteria for this objective because all complainant interviews were recorded in their entirety or a justification as to why the interview was not recorded in its entirety was provided. The remaining one (9%) WCSCR investigation did not meet the criteria for this objective because a justification as to why the interview was not recorded was not provided.

For Lancaster Station, five (83%) of the six WCSCR investigations reviewed met the criteria for this objective because all complainant interviews were recorded in their entirety or a justification as to why the interview was not recorded in its entirety was provided. The remaining one (17%) investigation did not meet the criteria because a justification as to why the interview was not recorded was not provided.

For Palmdale Station, one WCSCR investigation was not applicable to this objective because the complainant did not want to be interviewed and provided a written statement instead. The auditors noted all five (100%) WCSCR investigations reviewed met the criteria for this objective.

Specifically:

L-4: The investigator did not document in the Service Comment Review the reason the complainant interview was not recorded.

Recommendations

It is recommended the Department conduct recurrent briefings with investigators regarding the recording of complainant interviews in their entirety and documenting the reason in their investigation for not recording the interview. This information should be included in the complaint investigation checklist as recommended in Objective 1(a).

Objective No. 1(i) – Uninvolved Investigator

Criteria

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

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

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

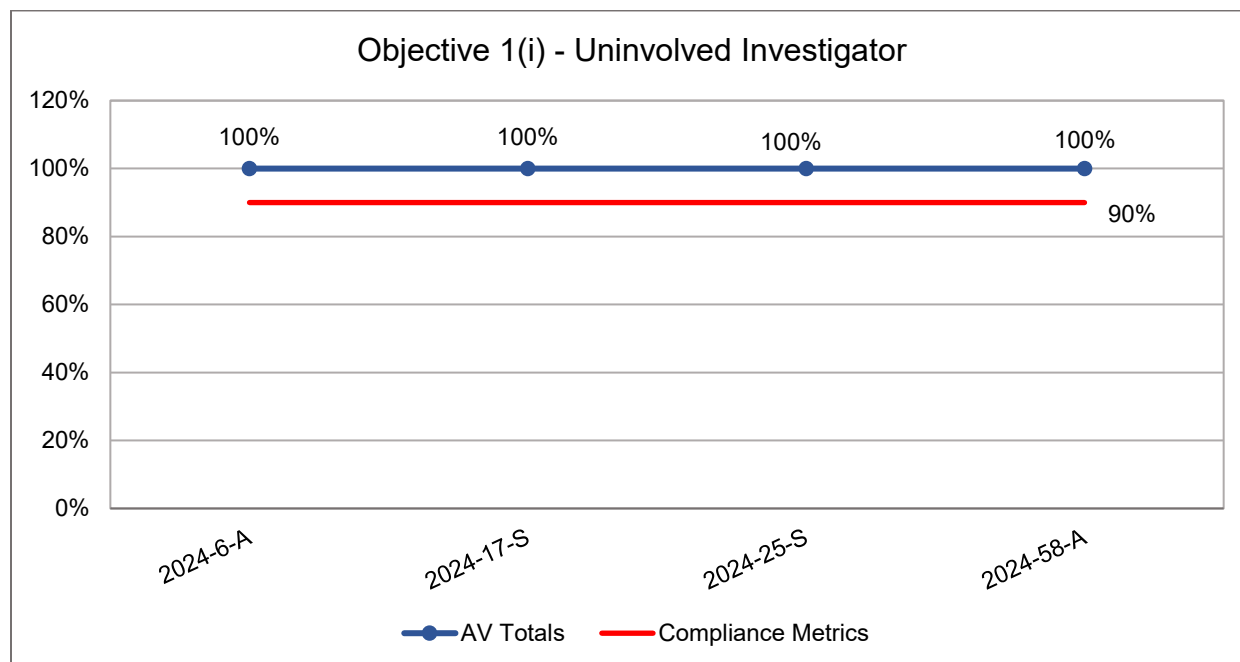
Per the MT, a minimally involved supervisor may conduct an investigation for a minor allegation when no uninvolved supervisor is available. When that occurs, the rationale must be documented in the investigation. When the complaint involves an allegation of serious misconduct, an uninvolved supervisor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

Procedures

The auditors reviewed all documentation in the completed packets, including incident reports, supplemental reports, and booking packets. Additionally, the auditors reviewed all available BWC recordings and complainant and civilian witness interviews. Furthermore, the auditors reviewed the involved and witness Department member statements. When the complaint involves an allegation of serious misconduct, the auditors verified the supervisor who completed the investigation was not involved in the incident in any way. However, when the complaint involves an allegation of minor misconduct and the supervisor who completed the investigation was involved in the incident, the auditors verified whether a documented reason was provided in the Service Comment Review and if it was sufficient to justify the supervisor completing the investigation.

The line graph below demonstrates the AV Stations were 100% compliant in all four audits. As a result, the AV Stations met the established compliance metrics for Objective 1(i) in all four audits.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
1	INVESTIGATION OF COMPLAINTS					
1(i)	<i>Uninvolved Investigator</i>	100%	100%	100%	100%	90%



Findings

For the AV Stations combined, all 12 (100%) WCSCR investigations reviewed met the criteria for this objective because the investigating supervisor was not involved in the incident and did not authorize the conduct that led to the complaint.

For Lancaster Station, all six (100%) WCSCR investigations reviewed met the criteria for this objective because the investigating supervisor was not involved in the incident and did not authorize the conduct that led to the complaint.

For Palmdale Station, all six (100%) WCSCR investigations reviewed met the criteria for this objective because the investigating supervisor was not involved in the incident and did not authorize the conduct that led to the complaint.

Recommendations

There are no recommendations because the AV Stations met the established compliance metrics.

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) & 140 (partial), (October 2019), Section 3D states:

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

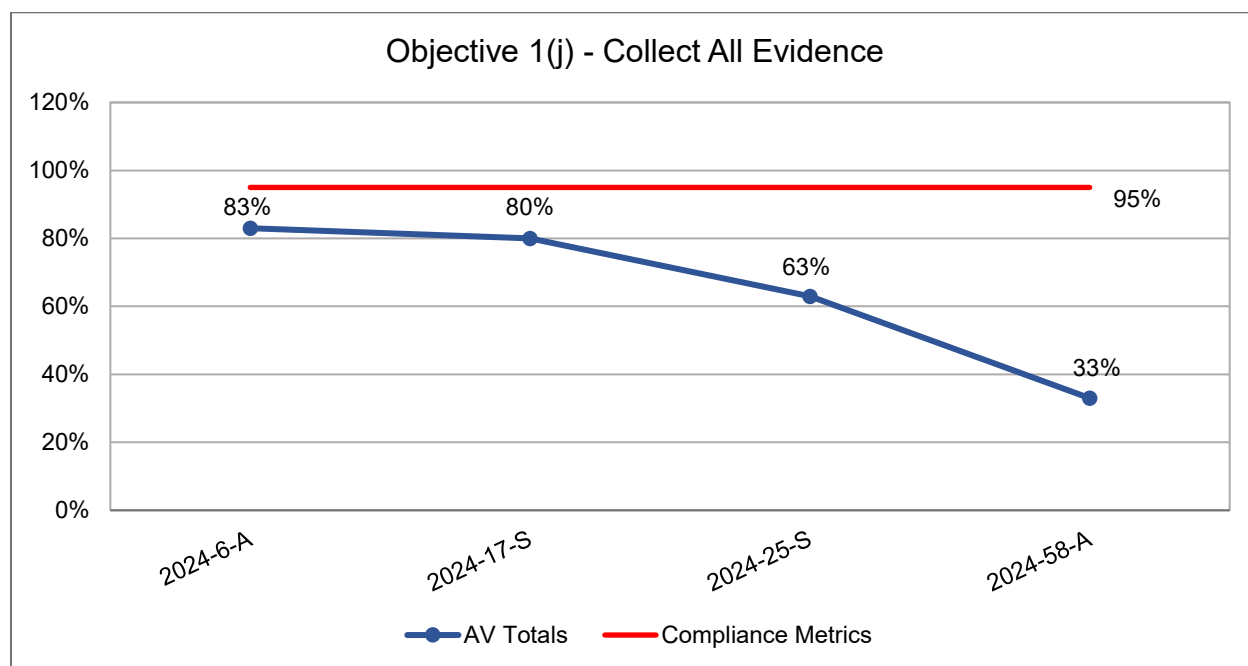
*D. **For at least 95%** of AV's public personnel complaints, it is apparent that all relevant evidence was considered, and credibility determinations made based upon that evidence.*

Procedures

The auditors reviewed all documentation in the completed packets, including incident reports, supplemental reports, and booking packets. Additionally, the auditors reviewed all available BWC recordings and complainant and civilian witness interviews. Furthermore, the auditors reviewed the involved and witness Department member statements. The auditors verified there was evidence to support each determination made.

The line graph below demonstrates the AV Stations showed a continued decrease in compliance in the second audit, third audit, and this audit. The AV Stations did not meet the established compliance metrics for Objective 1(j) in all four audits.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
1	INVESTIGATION OF COMPLAINTS					
1(j)	<i>Collect All Evidence</i>	83%	80%	63%	33%	95%



Findings

For the AV Stations combined, four (33%) of the 12 WCSCR investigations reviewed met the criteria for this objective because all relevant evidence was considered, and credibility determinations were made based upon that evidence. The remaining eight (67%) investigations did not meet the criteria for this objective because not all available evidence was gathered and considered.

For Lancaster Station, one (17%) of the six WCSCR investigations reviewed met the criteria for this objective because all relevant evidence was considered, and credibility determinations were made based upon that evidence. The remaining five (83%) investigations did not meet the criteria because not all available evidence was gathered and considered.

For Palmdale Station, three (50%) of the six WCSCR investigations reviewed met the criteria for this objective because all relevant evidence was considered, and credibility determinations were made based upon that evidence. The remaining three (50%) investigations did not meet the criteria because not all available evidence was gathered and considered.

Specifically:

L-1: The complainant alleged, in-person at Lancaster Station, during a traffic stop, the Department member was cold, condescending, and disrespectful and did not look at any of the complainant's paperwork that was relevant to the traffic stop. Per BWC recording, during the traffic stop, the complainant alleged she was being harassed. However, this allegation was not addressed in the WCSCR or the Service Comment Review and was not investigated.

L-2: Regarding the allegation the Department member broke the glove compartment box of the complainant's vehicle, an additional interview with the complainant was necessary to determine if the glove compartment box was not broken to support the current disposition of "Employee Conduct Appears Reasonable." Based on the lack of evidence, the disposition should have been "Unable to Make a Determination." In addition, based on the BWC recording, the Department member made several comments to and about the civilian witnesses that the auditors deemed discourteous. Based on the available evidence, the disposition regarding the allegation of discourtesy for this Department member should have been "Appears Employee Conduct Could Have Been Better" instead of the current disposition of "Employee Conduct Appears Reasonable."

L-4: Per Manual of Policy and Procedures (MPP) Section 3-01/040.62, Use of Sheriff's Intellectual Property/Star/Logos (December 2013), all requests by Department members to use the Department's intellectual property must have the Department member's Unit Commander's approval. However, the Department members did not obtain approval before commissioning Lancaster Station's Baker to Vegas t-shirt. Based on the available evidence, the disposition regarding the complainant's allegation the t-shirt depicted images "identical to a known cowboy deputy gang" should have been "Appears Employee Conduct Could Have Been Different" instead of the current disposition of "Appears Employee Conduct Could Have Been Better." This is the appropriate disposition for when an employee's actions were not in compliance with established procedures, policies, guidelines, or training.

L-5: Per BWC recording, the auditors noted a Department member used profanity during the call for service. However, the misconduct was not addressed in the WCSCR or the Service Comment Review and was not investigated. Per MPP Section 3-01/000.13, Professional Conduct – Core Values (January 2013), an example of conduct inconsistent with the Department’s core values includes, but is not limited to, the use of profanity. Based on the available evidence, it should have been categorized as an allegation under discourtesy and the disposition should have been "Employee Conduct Should Have Been Different." This is the appropriate disposition for when an employee’s actions were not in compliance with established procedures, policies, guidelines, or training. In addition, the complainant alleged the Department members at the incident did not obtain video footage he stated was relevant to the incident that led to the call for service. Based on the Service Comment Review, the auditors determined that a Department member should have been included under the allegation of neglect of duty because she was present when the complainant requested the Department members collect the available video footage. However, the footage was not obtained.

L-6: Since the complainant alleged the Lancaster Station Captain ordered Department members not to respond to the call for service, the Captain should have been included as an involved Department member and the allegation should have been categorized as a personnel complaint under neglect of duty. In addition, the complainant alleged the call taker purposely hung up on him. However, a disposition was not recorded on the Result of SCR form for this specific allegation.

P-2: The complainant alleged, while her son was at Palmdale Station jail, Department members stated they hoped he had a gun in his vehicle. However, there was no evidence to support or refute the allegation. Based on the lack of evidence, the disposition of the allegation should have been “Unable to Make a Determination” instead of the current disposition of “Employee Conduct Appears Reasonable.”

P-3: Regarding the allegation the handcuffs placed on the complainant were too tight, the investigator determined the conduct of the Department member that handcuffed the complainant appeared reasonable. However, based on the available evidence, an additional interview with the complainant and the Department member was necessary to determine if the handcuffs were adjusted to support the disposition for this allegation. Regarding the allegation of missing property, the complainant was informed the money was being held as evidence. However, there was a discrepancy between the amount of money the complainant alleged he had, and the amount booked as evidence. The discrepancy was not investigated. In addition, during the review of BWC recording, the auditors noted a Department member used profanity and was discourteous to the 17-year-old juvenile passenger in the complainant’s vehicle. This misconduct was not addressed in the WCSCR or the Service Comment Review and was not investigated.

P-4: The complainant alleged, via e-mail, during a traffic stop, the Department member was discourteous by having a condescending attitude, yelling at the complainant, and manipulating the law to get her way during the traffic stop. The disposition for the Department member regarding this allegation of discourtesy was “Employees Conduct Appears Reasonable.” However, per the BWC recording, the auditors noted the Department member engaged the complainant in an abrasive manner which may have aggravated the situation and resulted in the complaint being made. Based on the available evidence, the disposition should have been “Appears Employee Conduct Could Have Been Better.”

Recommendations

It is recommended the collection, organization, and review of all evidence be documented on the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a). The evidence collected must be sufficient and relevant to formulate and support credible conclusions for each allegation.

Objective No. 1(k) – Thoroughness of Investigation

Criteria

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

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

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 action²⁹ taken should be assessed.

Procedures

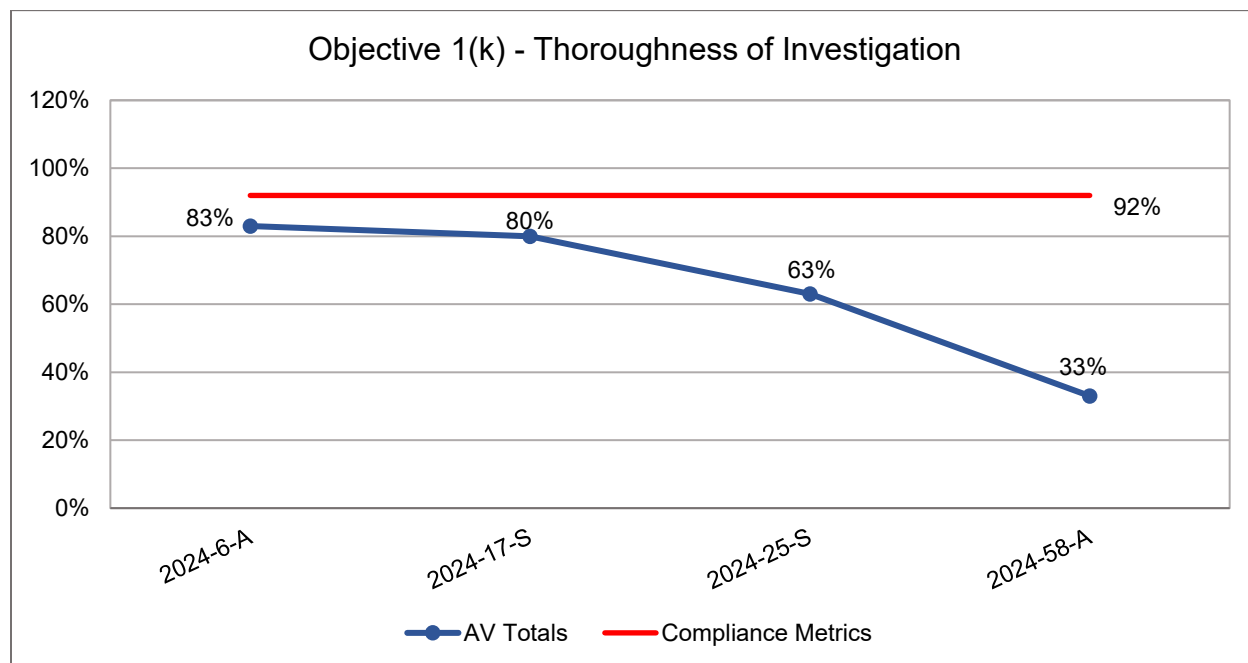
The auditors reviewed all documentation in the completed packets for each of the investigations, including incident reports, supplemental reports, and booking packets. Additionally, the auditors reviewed all available BWC recordings and complainant and civilian witness interviews. Furthermore, the auditors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

²⁹ 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.

For the two WCSCR investigations where the disposition on the Result of Service Comment Review was classified as “Employee Conduct Should Have Been Different”, the auditors assessed the appropriateness of the corrective action. The auditors concluded the investigations were classified as such and the corrective action for these investigations was appropriate.

The line graph below demonstrates the AV Stations had a continued decrease in compliance in the second audit, third audit, and this audit. The AV Stations did not meet the established compliance metrics for Objective 1(k) in all four audits.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
1	INVESTIGATION OF COMPLAINTS					
1(k)	<i>Thoroughness of Investigation</i>	83%	80%	63%	33%	92%



Findings

For the AV Stations combined, four (33%) of the 12 WCSCR investigations reviewed met the criteria for this objective because the complaint investigations were as thorough as necessary to reach reliable and complete findings. The remaining eight (67%) investigations did not meet the criteria for this objective because the investigations were not thorough enough to reach reliable and complete findings.

For Lancaster Station, one (17%) of the six WCSCR investigations reviewed met the criteria for this objective because the complaint investigations were as thorough as necessary to reach reliable and complete findings. The remaining five (83%) investigations did not meet the criteria because the investigations were not thorough enough to reach reliable and complete findings.

For Palmdale Station, three (50%) of the six WCSCR investigations reviewed met the criteria for this objective because the complaint investigations were as thorough as necessary to reach reliable and complete findings. The remaining three (50%) investigations did not meet the criteria because the investigations were not thorough enough to reach reliable and complete findings.

Specifically:

L-1: As previously mentioned, the complainant alleged she was being harassed during a traffic stop. However, this allegation was not addressed in the WCSCR or the Service Comment Review and was not investigated. As a result, a thorough investigation was not conducted.

L-2: Regarding the allegation the Department member broke the glove compartment box of the complainant's vehicle, an additional interview with the complainant was necessary to determine if the glove compartment box was not broken to support the current disposition for this allegation. As a result, a thorough investigation was not conducted because the disposition regarding this allegation may have changed based on additional information obtained when conducting the interview. In addition, the auditors noted the Department member made several comments that were discourteous to, and about, the civilian witnesses during the traffic stop. However, the disposition for the allegation of discourtesy regarding the Department member's conduct was "Employee Conduct Appears Reasonable." The investigation was not as thorough as necessary to reach a reliable and complete finding. The disposition should have been "Appears Employee Conduct Could Have Been Better."

L-4: Since the Department members did not obtain approval from the Unit Commander before commissioning Lancaster Station's Baker to Vegas t-shirt, the Department members violated a Department policy and the appropriate disposition should have been "Employee Conduct Should Have Been Different." The investigation was not as thorough as necessary to reach a reliable and complete finding.

L-5: The Department member's use of profanity during the call for service should have been noted in the WCSCR and the Service Comment Review, investigated, and categorized as an allegation under discourtesy. In addition, the Department member should have been included under the allegation of neglect of duty because she was present when the complainant requested the Department members collect the available video footage. The investigation was not as thorough as necessary to reach a reliable and complete finding.

L-6: The complainant alleged the Lancaster Station Captain ordered Department members not to respond to the call for service. However, the Captain was not included as an involved Department member. In addition, the complainant alleged the call taker purposely hung up on him. However, a disposition was not recorded on the Result of SCR form for this specific allegation. As a result, the investigation was not as thorough as necessary to reach a reliable and complete finding.

P-2: The auditors noted there was no evidence to support or refute the allegation the Department members stated they hoped the complainant's son had a gun in his vehicle. The disposition of the allegation should have been "Unable to Make a Determination." The investigation was not as thorough as necessary to reach a reliable and complete finding.

P-3: Regarding the allegation the handcuffs placed on the complainant were too tight, an additional interview with the complainant and the Department member was necessary to determine if the handcuffs were adjusted to support the disposition for this allegation. Regarding the allegation of missing property, there was a discrepancy between the amount of money the complainant alleged he had, and the amount booked as evidence. However, the discrepancy was not investigated. In addition, the misconduct of the Department member who used profanity and was discourteous to the 17-year-old juvenile passenger in the complainant's vehicle was not addressed in the WCSCR or the Service Comment Review and was not investigated. The investigation was not as thorough as necessary to reach a reliable and complete finding.

P-4: The disposition for the allegation of discourtesy was "Employee Conduct Appears Reasonable." However, per the BWC recording, the auditors noted the Department member engaged the complainant in an abrasive manner which may have aggravated the situation and resulted in the complaint alleging the Department member was discourteous. The disposition should have been "Appears Employee Conduct Could Have Been Better." As a result, the investigation was not as thorough as necessary to reach a reliable and complete finding.

Recommendations

It is recommended all related evidence, including but not limited to complainant and witness interviews, booking paperwork, crime and supplemental reports, and BWC recordings the investigators consider when conducting an investigation to formulate and support logical conclusions for each allegation be documented on the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a).

Objective No. 2 – Management Review and Oversight

This objective evaluated the management review and oversight of WCSCR investigations.

Objective No. 2(a) – Statement Discarded Due to Criminal History

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (partial), 133, 134, 135, 136 & 137 (October 2019), Section 3B (8) states:

3. *LASD will be deemed in substantial outcomes compliance when: ...*
 - 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: ...*
 8. *Personnel complaint investigations do not disregard a witness' statement merely because the witness has some connection to the complainant or because of any criminal history.*

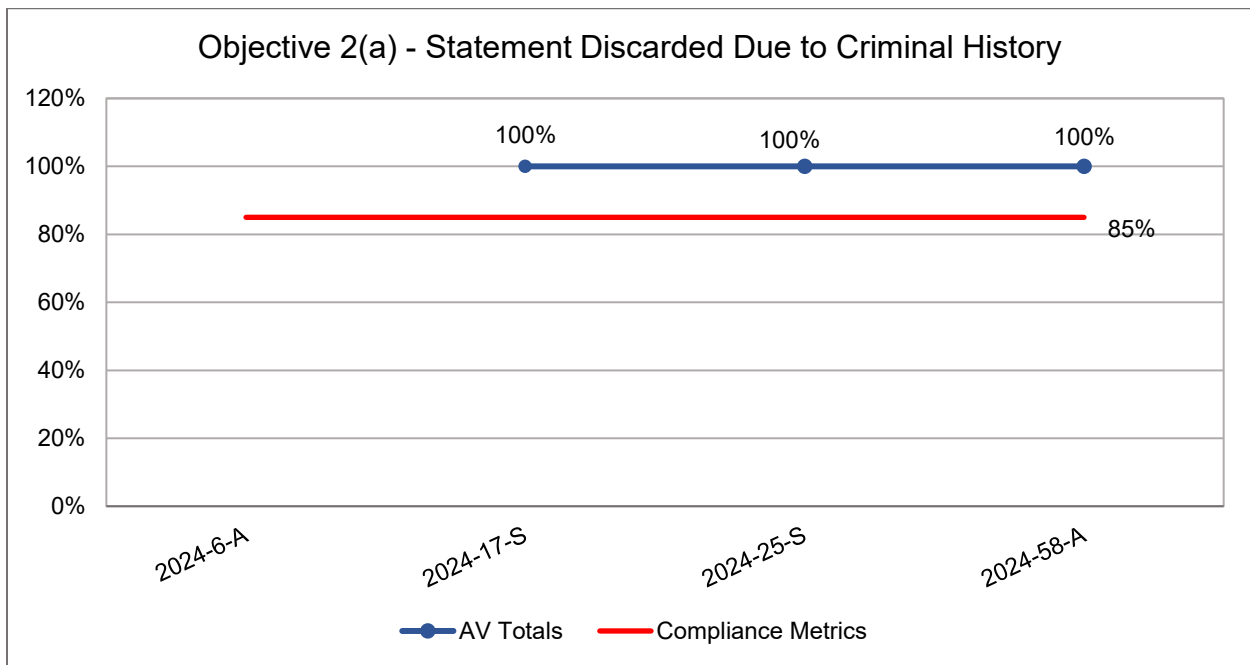
Per the MT, the auditors will determine if any statements, including complainant statements, were disregarded for one of the prohibited reasons.

Procedures

The auditors reviewed the complainant and civilian witness interviews. In addition, the auditors reviewed the involved and witness Department member statements, as well as all available corresponding documentation and BWC recordings. The auditors verified the supervising investigators did not disregard any statements.

The line graph below demonstrates the AV Stations were 100% compliant in the second audit, third audit, and this audit. The AV Stations met the established compliance metrics for Objective 2(a) in all three audits. No incidents were noted in the first audit.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
2	MANAGEMENT REVIEW AND OVERSIGHT					
2(a)	<i>Statement Discarded Due to Criminal History</i>	NIN	100%	100%	100%	85%



Findings

For the AV Stations combined, all 12 (100%) WCSCR investigations reviewed met the criteria for this objective because no statements were disregarded.

For Lancaster Station, all six (100%) WCSCR investigations reviewed met the criteria for this objective because no statements were disregarded.

For Palmdale Station, all six (100%) WCSCR investigations reviewed met the criteria for this objective because no statements were disregarded.

Recommendations

There are no recommendations because the AV Stations met the established compliance metrics.

Objective No. 2(b) – Deputy Statement Given Preference

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (partial), 133, 134, 135, 136 & 137 (October 2019), Section 3B (7) states:

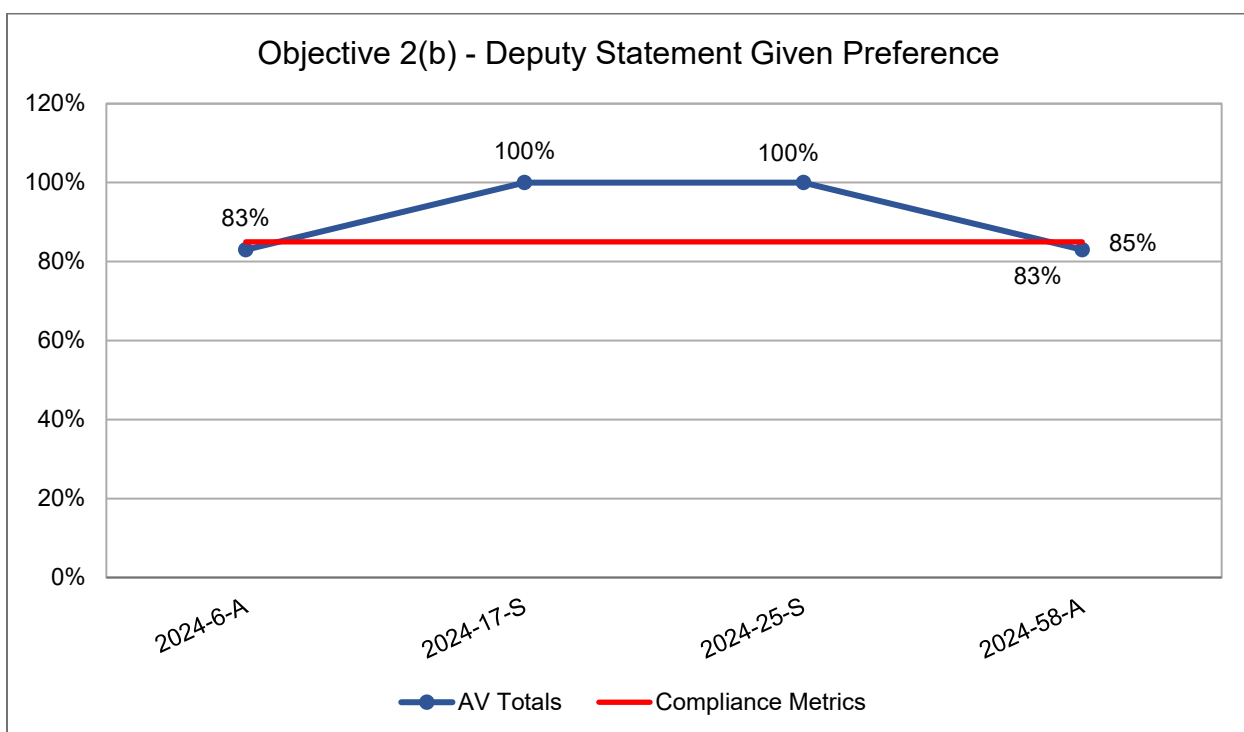
3. *LASD will be deemed in substantial outcomes compliance when: ...*
 - B. *At least 85% of AV's public personnel complaint investigations meet the investigative requirements identified in the SA. This will involve a qualitative and quantitative evaluation of the following SA requirements: ...*
 7. *Personnel complaint investigations do not give automatic preference for a deputy's statement over a non-deputy's statement.*

Procedures

The auditors reviewed the complainant and civilian witness interview recordings. In addition, the auditors reviewed the involved and witness Department member statements, as well as all available corresponding documentation and BWC recordings. The auditors verified the supervising investigators were not partial to Department member statements and completed an objective and thorough investigation by reviewing all available evidence before making a determination.

The line graph below demonstrates the AV Stations had an increase in compliance in the second audit and remained consistent in the third audit, but there was a decrease in compliance in this audit. The AV Stations met the established compliance metrics for Objective 2(b) in the second audit and third audit. However, the AV Stations did not meet the established compliance metrics in the first audit and this audit.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
2	MANAGEMENT REVIEW AND OVERSIGHT					
2(b)	<i>Deputy Statement Given Preference</i>	83%	100%	100%	83%	85%



Findings

For the AV Stations combined, 10 (83%) of the 12 WCSCR investigations reviewed met the criteria for this objective because automatic preference was not given to a Department member’s statement over a non-Department member’s statement. The remaining two (17%) investigations did not meet the criteria for this objective because automatic preference was given to a Department member’s statement over a non-Department member’s statement.

For Lancaster Station, all six (100%) WCSCR investigations reviewed met the criteria for this objective because automatic preference was not given to a Department member's statement over a non-Department member's statement.

For Palmdale Station, four (67%) of the six WCSCR investigations reviewed met the criteria for this objective because automatic preference was not given to a Department member's statement over a non-Department member's statement. The remaining two (33%) investigations did not meet the criteria because automatic preference was given to a Department member's statement over a non-Department member's statement.

Specifically:

P-2: Regarding the complainant's allegation while her son was at Palmdale Station jail, Department members stated they hoped he had a gun in his vehicle, the investigator determined the conduct of the Department members appeared reasonable. However, there was no BWC recording or supporting documentation to support this did not occur. As a result, the Department members' statements were given preference over the complainant's statement.

P-3: Regarding the complainant's allegation the handcuffs placed on him were too tight, the investigator determined the conduct of the Department member who handcuffed the complainant appeared reasonable. However, based on the BWC recording and supporting documentation, the auditors could not determine if the handcuffs were adjusted. Additional interviews with the complainant and the Department member to determine if the handcuffs were adjusted to support the disposition for this allegation were not conducted. As a result, the Department member's statement was given preference over the complainant's statement.

Recommendations

In keeping with the principles of a thorough, complete investigation, the investigator should not give automatic preference to the deputy's statement over the non-deputy. Investigations should demonstrate the use of all necessary documentation, including witness statements, a review of BWC recording, or other recording devices as the basis to arrive at conclusions. The adjudication should reflect as such. It is recommended that Field Operations Support Services revise the Service Comment Review investigation format, which is documented on a SH-AD-711, to include the following statement, "Department supervisors shall conduct complaint investigations fairly and impartially to avoid the appearance of bias for deputy personnel." This statement should be added directly under the "Involved Employee Statement" and the "Employee Witness Statement" sections of the investigation.

Objective No. 2(c) – Preponderance of Evidence

Criteria

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

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

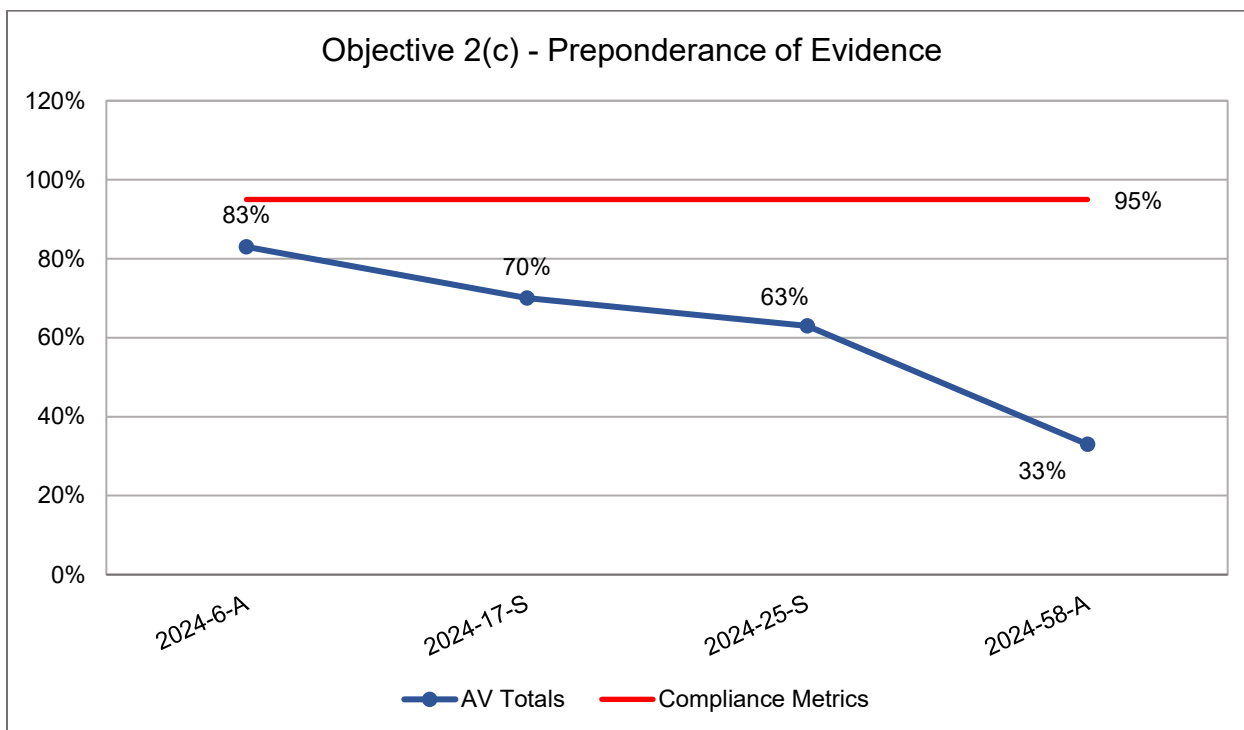
*E. For **at least 95%** of public complaints, each significant allegation is adjudicated using the preponderance of evidence standard.*

Procedures

The auditors reviewed all documentation in the completed packets for each of the investigations and all available BWC recordings. The auditors also reviewed the complainant and civilian witness interviews, as well as the involved and witness Department member statements. In addition, the auditors verified each allegation resulting from their review was addressed in the Service Comment Review and was adjudicated using the preponderance of evidence standard. Furthermore, the auditors verified a disposition was documented on the Result of Service Comment Review for each significant allegation noted by the auditors.

The line graph below demonstrates the AV Stations had a continued decrease in compliance in the second audit, third audit, and this audit. The AV Stations did not meet the established compliance metrics for Objective 2(c) in all four audits.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
2	MANAGEMENT REVIEW AND OVERSIGHT					
2(c)	<i>Preponderance of Evidence</i>	83%	70%	63%	33%	95%



Findings

For the AV Stations combined, four (33%) of the 12 WCSCR investigations reviewed met the criteria for this objective because each significant allegation was adjudicated using the preponderance of evidence standard. The remaining eight (67%) investigations did not meet the criteria for this objective because there was not enough evidence obtained to support the determination and outcome.

For Lancaster Station, one (17%) of the six WCSCR investigations reviewed met the criteria for this objective because each significant allegation was adjudicated using the preponderance of evidence standard. The remaining five (83%) investigations did not meet the criteria because there was not enough evidence obtained to support the determination and outcome.

For Palmdale Station, three (50%) of the six WCSCR investigations reviewed met the criteria for this objective because each significant allegation was adjudicated using the preponderance of evidence standard. The remaining three (50%) investigations did not meet the criteria because there was not enough evidence obtained to support the determination and outcome.

Specifically:

L-1: As previously mentioned, the complainant alleged she was being harassed during a traffic stop. However, this allegation was not addressed in the WCSCR or the Service Comment Review and was not investigated. As a result, the WCSCR investigation was not adequately reviewed.

L-2: Since an additional interview with the complainant that was necessary to determine if the glove compartment box was not broken to support the current disposition for this allegation was not conducted, the disposition for this allegation should have been “Unable to Make a Determination” instead of “Employee Conduct Appears Reasonable.” In addition, since the Department member made several comments to and about the civilian witnesses’ that the auditors deemed discourteous, the disposition regarding the allegation of discourtesy for this Department member should have been “Appears Employee Conduct Could Have Been Better” instead of the current disposition of “Employee Conduct Appears Reasonable.” As a result, the WCSCR investigation was not adequately reviewed.

L-4: Per MPP Section 3-01/040.62, Use of Sheriff’s Intellectual Property/Star/Logos (December 2013), all requests by Department members to use the Department’s intellectual property must have the Department member’s Unit Commander’s approval. However, the Department members did not obtain approval before commissioning Lancaster Station’s Baker to Vegas t-shirt. As a result, the disposition should have been “Employee Conduct Should Have Been Different” instead of the current disposition of “Appears Employee Conduct Could Have Been Better.” As a result, the WCSCR investigation was not adequately reviewed.

L-5: The Department member’s use of profanity during the call for service was not addressed or investigated. In addition, the Department member was not included under the allegation of neglect of duty even though she was present when the complainant requested the Department members collect the available video footage. As a result, the WCSCR investigation was not adequately reviewed.

L-6: Regarding the complaint the Lancaster Station Captain ordered Department members not to respond to the call for service, the Captain was not included as an involved Department member. In addition, a disposition for the allegation the call taker purposely hung up on him was not recorded on the Result of SCR form. Therefore, the WCSCR investigation was not adequately reviewed.

P-2: The auditors noted there was no evidence to support or refute the allegation the Department members stated they hoped the complainant's son had a gun in his vehicle. The disposition of the allegation should have been "Unable to Make a Determination" instead of the current disposition of "Employee Conduct Appears Reasonable." The WCSCR investigation was not adequately reviewed.

P-3: An additional interview with the complainant and the Department member was necessary to determine if the handcuffs the complainant alleged were too tight were adjusted to support the disposition for this allegation. In addition, the discrepancy between the amount of money the complainant alleged he had and the amount booked as evidence was not investigated. Furthermore, the misconduct of the Department member who used profanity and was discourteous to the 17- year- old juvenile passenger in the complainant's vehicle was not addressed in the WCSCR or the Service Comment Review and was not investigated. The WCSCR investigation was not adequately reviewed.

P-4: Regarding the allegation the Department member was discourteous, the auditors noted the Department member engaged with the complainant on occasion during the traffic stop which may have aggravated the situation. In addition, in the Service Comment Review, the investigator stated there were a few times the Department member began to engage with the complainant. The disposition should have been "Appears Employee Conduct Could Have Been Better" instead of the current disposition of "Employee Conduct Appears Reasonable." The WCSCR investigation was not adequately reviewed.

Recommendations

It is recommended Unit Commanders thoroughly review WCSCR investigations to adjudicate the investigations based upon the preponderance of the evidence standard. NPD Commanders should take documented corrective action when a Unit Commander fails to properly review an investigation.

Objective No. 2(d) – Timeliness of Adjudication

Criteria

There is no specific compliance metrics for sub-objective 2(d), “Timeliness of Adjudication.” The current, approved SCR Handbook (June 2011) and the Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), indicate a 30-day timeline to submit the completed WCSCR investigation packet to NPD and a 60-day timeline to submit the completed WCSCR investigation packet to the Discovery Unit.

The SCR Handbook is currently being revised to propose a 60-day timeline for submission to NPD and a 90-day timeline to the Discovery Unit. Per discussions with the MT, the auditors agreed to utilize the draft SCR Handbook’s proposed timelines as the standard for evaluating the timeliness of WCSCR investigations for this audit.

Procedures

To determine whether each of the WCSCR investigations reviewed were submitted to NPD within the 60-day requirement, the auditors calculated the number of days from the complaint report date on the WCSCR to the Unit Commander’s approval date on the Result of SCR form.

To determine whether each of the WCSCR investigations reviewed were submitted to the Discovery Unit within the 90-day requirement, the auditors calculated the number of days from the complaint report date to the NPD Commander’s approval date on the Result of SCR form.

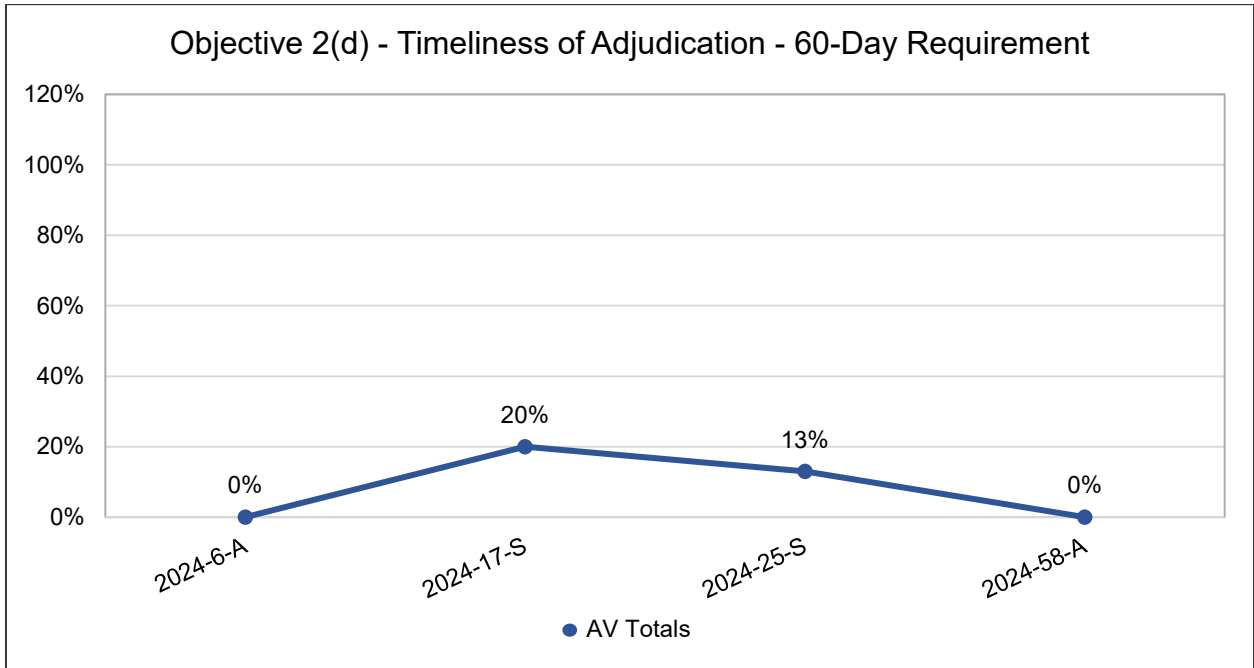
Regarding the AV Stations submitting the WCSCR investigations to NPD within the 60-day requirement, the line graph below demonstrates the AV Stations had an increase in compliance in the second audit and a decrease in compliance in the third audit and this audit.

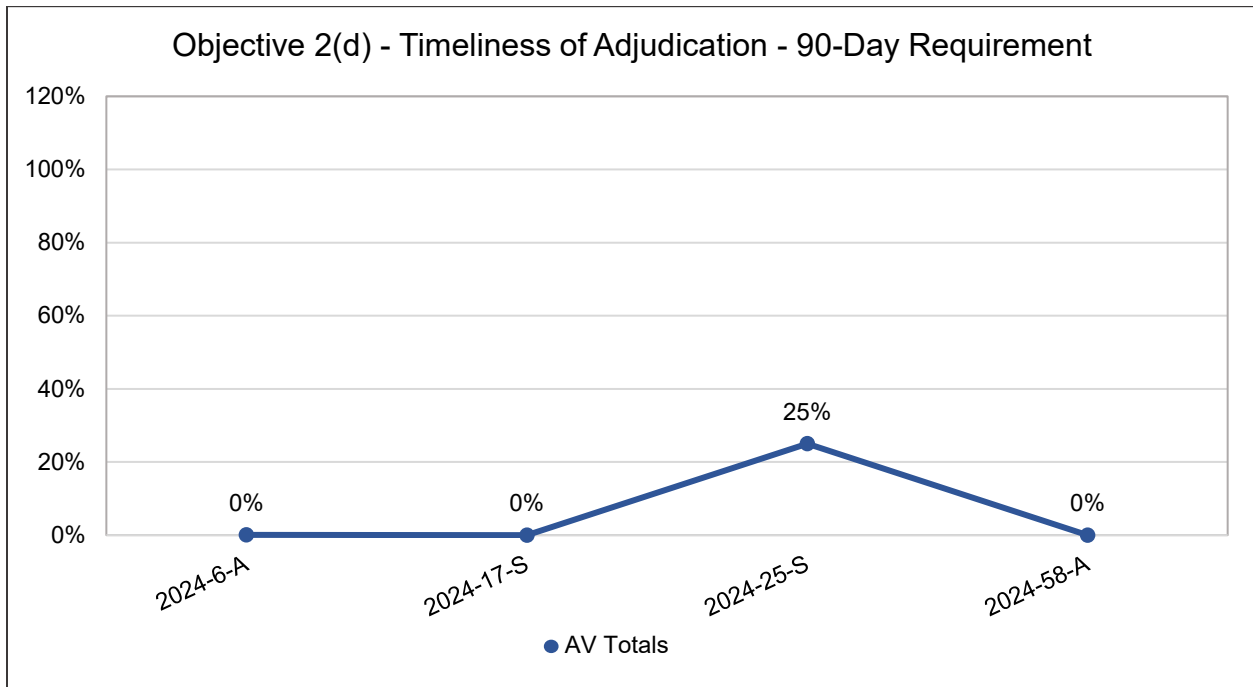
Regarding the AV Stations submitting the WCSCR investigations to the Discovery Unit within the 90-day requirement, the line graph below demonstrates the AV Stations had a 0% compliance in the first audit, second audit, and this audit. However, the AV Stations were 25% compliant in the third audit.

PART III OF PUBLIC COMPLAINTS AUDIT:
 INVESTIGATION AND MANAGEMENT REVIEW AND OVERSIGHT OF PUBLIC COMPLAINTS
 ANTELOPE VALLEY STATIONS
 PROJECT NO. 2024-58-A

As mentioned above, there are no established compliance metrics for Objective 2(d).

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
2(d)	<i>Timeliness of Adjudication - 60 Day Requirement</i>	0%	20%	13%	0%	N/A
	<i>Timeliness of Adjudication - 90 Day Requirement</i>	0%	0%	25%	0%	





The auditors also determined how long it took the investigator, Operations, and NPD Aide to review the WCSCR investigations.

Findings

For the AV Stations combined, none (0%) of the 12 WCSCR investigations reviewed met the criteria for this objective because the investigations were submitted to NPD and the Discovery Unit beyond the required timeframes.

For Lancaster Station, none (0%) of the 12 WCSCR investigations reviewed met the criteria for this objective because the investigations were submitted to NPD and the Discovery Unit beyond the required timeframes.

For Palmdale Station, none (0%) of the 12 WCSCR investigations reviewed met the criteria for this objective because the investigations were submitted to NPD and the Discovery Unit beyond the required timeframes.

Specifically:

Sample No.	No. of Days WCSCR Investigation was Approved Beyond the 60-Day Requirement	No. of Days WCSCR Investigation was Approved Beyond the 90-Day Requirement
L-1	79	156
L-2	1	9
L-3	48	34
L-4	4	8
L-5	7	20
L-6	45	127
P-1	23	69
P-2	19	69
P-3	34	58
P-4	34	65
P-5	14	24
P-6	12	17

During the review, the auditors also noted:

- The investigators for Lancaster Station and Palmdale Station took an average of 50 days and 64 days, respectively, to complete their review.
- Operations for Lancaster Station and Palmdale Station took an average of 24 days and 14 days, respectively, to complete their review.
- The NPD Aides for Lancaster Station and Palmdale Station took an average of 16 days and 36 days, respectively, to complete their review.

Recommendations

It is recommended the Department implement the revised timelines in the proposed draft SCR Handbook. The expanded timelines may help ensure investigations are thorough and complete prior to submission to the Unit Commander as well as to NPD. In addition, it is recommended the AV Stations conduct an analysis to determine the main cause of the delays in completing the investigations in a timely manner. It is also recommended an internal tracker is developed to monitor the completion status of the WCSCR investigation at each level of review.

Objective No. 2(e) – Recordation of Critical Information on the Result of SCR Form

Criteria

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

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

F. In at least 95% of public complaints, critical information is recorded accurately in the Service Comment Review packet... Critical information includes all accused employees, allegations of significant misconduct, disposition of each allegation and any corrective action recommended or taken.

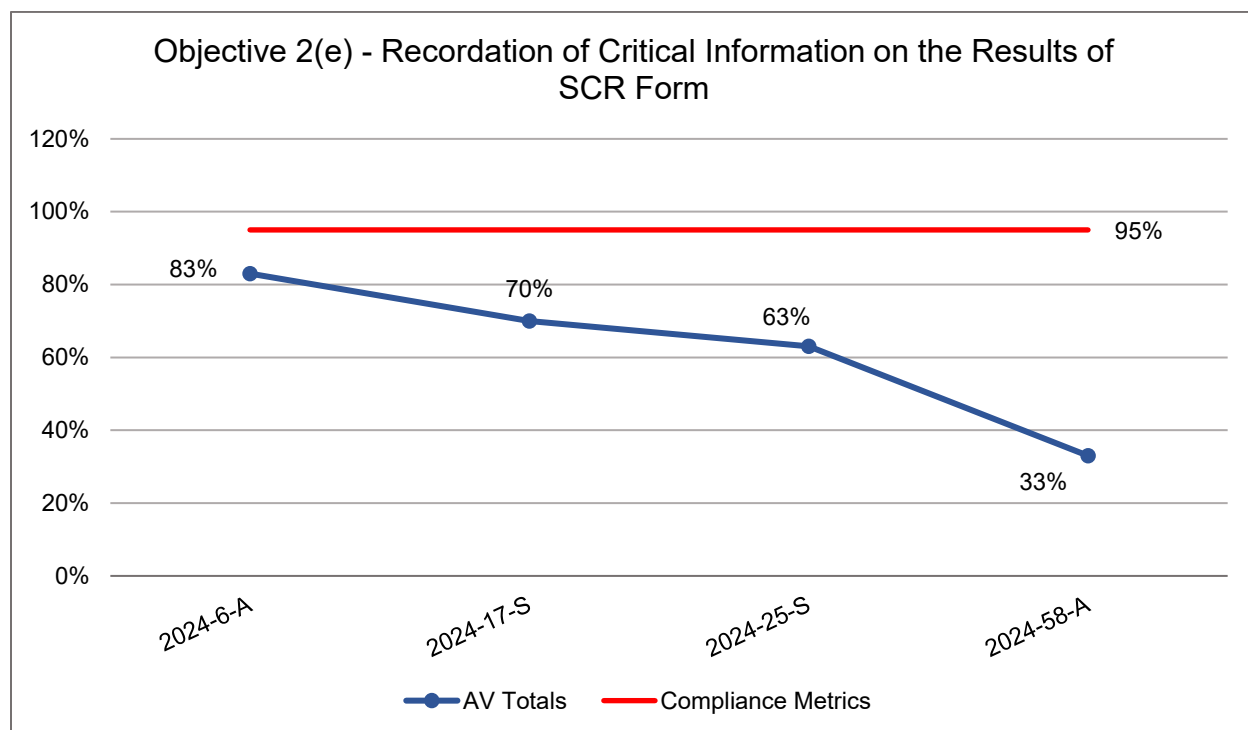
Per the MT, the critical information on the Result of Service Comment Review forms should be compared to the corresponding information in the WCSCR investigation packet, BWC recordings, and audio recordings, as well as in PRMS to ensure the accuracy of the critical information recorded on the Result of SCR form. For example, if the disposition on the Result of Service Comment Review was “Employee Conduct Appears Reasonable” but the auditors determined the disposition should have been “Appears Employee Conduct Could Have Been Better”, the investigation was noncompliant because the disposition was not accurately recorded on the Result of SCR form.

Procedures

The auditors reviewed the critical information on the Result of SCR forms and compared this information to the corresponding information in the WCSCR investigation packet, BWC recordings, and audio recordings, as well as in PRMS to ensure all critical information was accurately recorded on the Result of SCR form. In addition, if there were any differences among the critical data recorded, the auditors determined which data was accurate.

The line graph below demonstrates the AV Stations continued to show a decrease in compliance in the second audit, third audit, and this audit. The AV Stations did not meet the established compliance metrics for Objective 2(e) in all four audits.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
2	MANAGEMENT REVIEW AND OVERSIGHT					
2(e)	<i>Recordation of Critical Information on the Result of SCR Form</i>	83%	70%	63%	33%	95%



Findings

For the AV Stations combined, four (33%) of the 12 WCSCR investigations reviewed met the criteria for this objective because all critical information was recorded accurately on the Result of SCR form. The remaining eight (67%) investigations did not meet the criteria for this objective because critical information was not accurately recorded on the Result of SCR form.

For Lancaster Station, one (17%) of the six WCSCR investigations reviewed met the criteria for this objective because all critical information was recorded accurately on the Result of SCR form. The remaining five (83%) investigations did not meet the criteria because critical information was not accurately recorded on the Result of SCR form.

For Palmdale Station, three (50%) of the six WCSCR investigations reviewed met the criteria for this objective because all critical information was recorded accurately on the Result of SCR form. The remaining three (50%) investigations did not meet the criteria because critical information was not accurately recorded on the Result of SCR form. Specifically:

L-1: The complainant's allegation that she was harassed during the traffic stop was not addressed in the WCSCR or the Service Comment Review and was not investigated. As a result, a disposition was not recorded on the Result of SCR form for this specific allegation.

L-2: Regarding the allegation the Department member broke the glove compartment box of the complainant's vehicle, an additional interview with the complainant was necessary to determine if the glove compartment box was not broken to support the current disposition for this allegation. As a result, the disposition should have been "Unable to Make a Determination." In addition, based on the BWC recording, the Department member made several comments to and about the civilian witnesses' that the auditors deemed discourteous. As a result, the disposition regarding the allegation of discourtesy for this Department member should have been "Appears Employee Conduct Could Have Been Better."

L-4: The Department members violated Department policy because they did not obtain approval from the Unit Commander before commissioning Lancaster Station's Baker to Vegas t-shirt. The disposition should have been "Appears Employee Conduct Could Have Been Different" instead of the current disposition of "Appears Employee Conduct Could Have Been Better."

L-5: The auditors noted a Department member used profanity during the call for service. It should have been categorized as an allegation under discourtesy and the disposition should have been "Employee Conduct Should Have Been Different" because the employee's actions were not in compliance with MPP Section 3-01/000.13, Professional Conduct – Core Values (January 2013), which states conduct inconsistent with the Department core values includes, but is not limited to, the use of profanity. In addition, a Department member should have been included under the allegation of neglect of duty and the disposition should have been "Employee Conduct Could Have Been Better" because she was present when the complainant requested the Department members collect the available video footage, and the footage was not obtained.

L-6: The complainant alleged the Lancaster Station Captain ordered Department members not to respond to the call for service. The Captain should have been included as an involved Department member. The allegation should have been categorized as a personnel complaint under neglect of duty. In addition, the complainant alleged the call taker purposely hung up on him. However, a disposition was not recorded on the Result of SCR form for this specific allegation. As a result, this allegation was not dispositioned. The disposition for this allegation should have been "Employee Conduct Could Have Been Better."

P-2: The disposition of the allegation the Department members stated they hoped the complainant's son had a gun in his vehicle should have been "Unable to Make a Determination" instead of the current disposition of "Employee Conduct Appears Reasonable" because there was no evidence to support or refute the allegation.

P-3: Regarding the allegation the handcuffs placed on the complainant were too tight, the investigator determined the conduct of the Department member that handcuffed the complainant appeared reasonable. However, based on the available evidence, an additional interview with the complainant and the Department member was necessary to determine if the handcuffs were adjusted, which may have changed the disposition for this allegation. Regarding the allegation of missing property, the complainant was informed the money was being held as evidence. However, there was a discrepancy between the amount of money the complainant alleged he had, and the amount booked as evidence. However, the discrepancy was not investigated. In addition, during the review of the BWC recording, the auditors noted a Department member used profanity and was discourteous to the 17- year- old juvenile passenger in the complainant's vehicle. However, this misconduct was not addressed in the WCSCR or the Service Comment Review and was not investigated. As a result, a disposition was not recorded on the Result of SCR form for this specific misconduct.

P-4: The disposition of the allegation the Department member was discourteous should have been "Appears Employee Conduct Could Have Been Better" instead of the current disposition of "Employee Conduct Appears Reasonable" because the Department member engaged with the complainant on occasion during the traffic stop which may have aggravated the situation.

Recommendations

It is recommended all levels of personnel responsible for processing complaints, from initial intake to final disposition, take ownership of all critical information obtained in the WCSCR. NPD Commanders must take documented corrective actions when inaccuracies are not corrected.

Objective No. 2(f) – Recordation of Non-Critical Information on the Result of SCR Form

Criteria

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

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

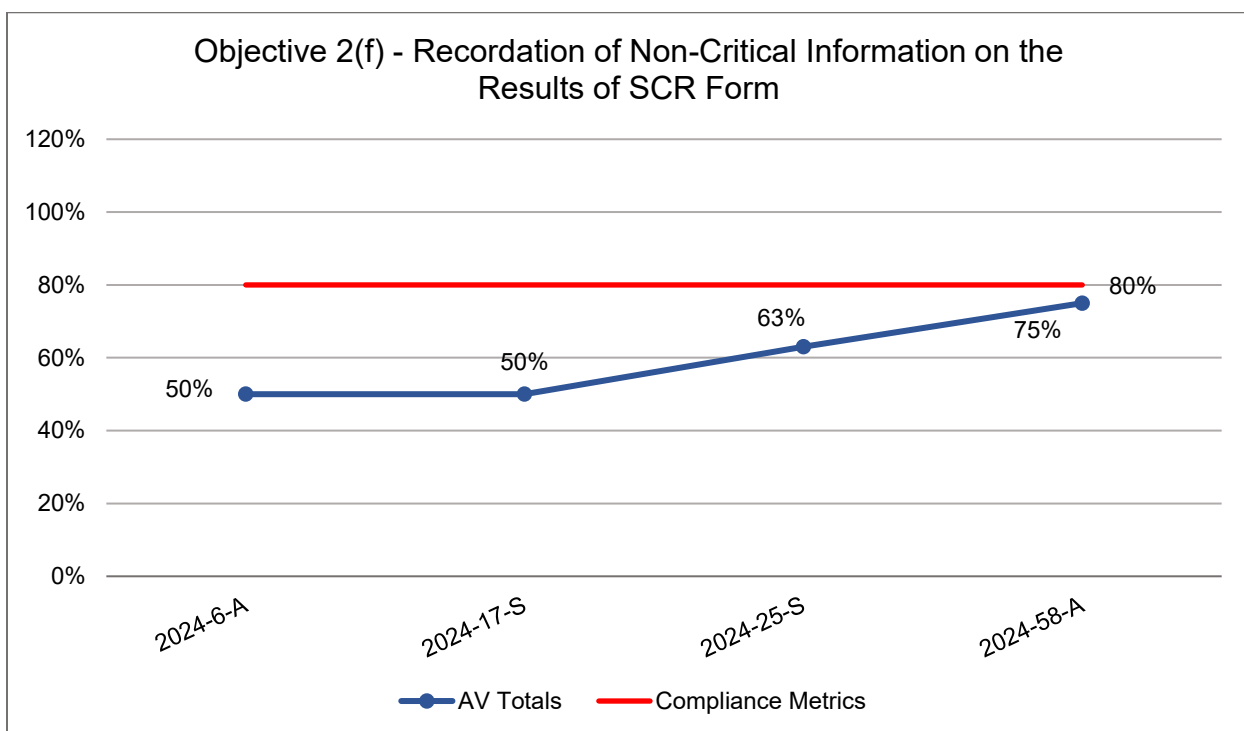
G. ***In at least 80% of public complaints, non-critical information is recorded accurately on the Results of Service Comment Review form. Non-critical information is anything not classified as critical, e.g., accused employees, allegations, dispositions and corrective action.***

Procedures

The auditors reviewed the non-critical information on the Result of SCR forms and compared this information to the corresponding information in the WCSCR investigation packet, BWC recordings, and audio recordings, as well as in PRMS to ensure all non-critical information was accurately recorded on the Result of SCR form. In addition, if there were any differences among the non-critical data recorded, the auditors determined which data was accurate.

The line graph below demonstrates the AV Stations were 50% compliant in the first audit and second audit. However, the AV Stations compliance increased in the third audit and this audit. The AV Stations did not meet the established compliance metrics for Objective 2(f) in all four audits.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
2	MANAGEMENT REVIEW AND OVERSIGHT					
2(f)	<i>Recordation of Non-Critical Information on the Result of SCR Form</i>	50%	50%	63%	75%	80%



Findings

For the AV Stations combined, nine (75%) of the 12 WCSCR investigations reviewed met the criteria for this objective because all non-critical information was recorded accurately on the Result of SCR form. The remaining three (25%) investigations did not meet the criteria for this objective because non-critical information was not accurately recorded on the Result of SCR form.

For Lancaster Station, all six (100%) WCSCR investigations reviewed met the criteria for this objective because all non-critical information was recorded accurately on the Result of SCR form.

For Palmdale Station, three (50%) of the six WCSCR investigations reviewed met the criteria for this objective because all non-critical information was recorded accurately on the Result of SCR form. The remaining three (50%) investigations did not meet the criteria because non-critical information was not accurately recorded on the Result of SCR form.

Specifically:

P-3: The date Palmdale Station received the complaint was not accurately recorded on the Result of SCR form.

P-4: The risk management tracker number for the corresponding complaint was not accurately recorded on the Result of SCR form.

P-5: The date the Service Comment Review was completed was not accurately recorded on the Result of SCR form.

Recommendations

It is recommended written guidelines are established for unit-level Operations staff who are tasked with reviewing and distributing the completed WCSCR packets. Additional training on accurately transcribing all “non-critical information” on the Result of Service Comment Review would assist in correcting errors currently found in completed packets. It is also recommended a second level of review is implemented once the form is completed by Operations staff.

Lastly, it is recommended the Result of Service Comment Review should indicate who completed the form up to the final approval stages. Adding a first and second level signature line would help establish accountability and ensure accurate information in PRMS.

Objective No. 2(g) – Recordation of Critical Information in the PRMS

Criteria

Agreement Paragraph 142 states:

LASD-AV will ensure that PPI³⁰ data is accurate and hold responsible AV personnel accountable for inaccuracies in any data entered.

Per discussions with the MT, the compliance metric for this sub-objective is 95%.

The Discovery Unit has the responsibility to record the information contained within the Result of SCR form into PRMS.

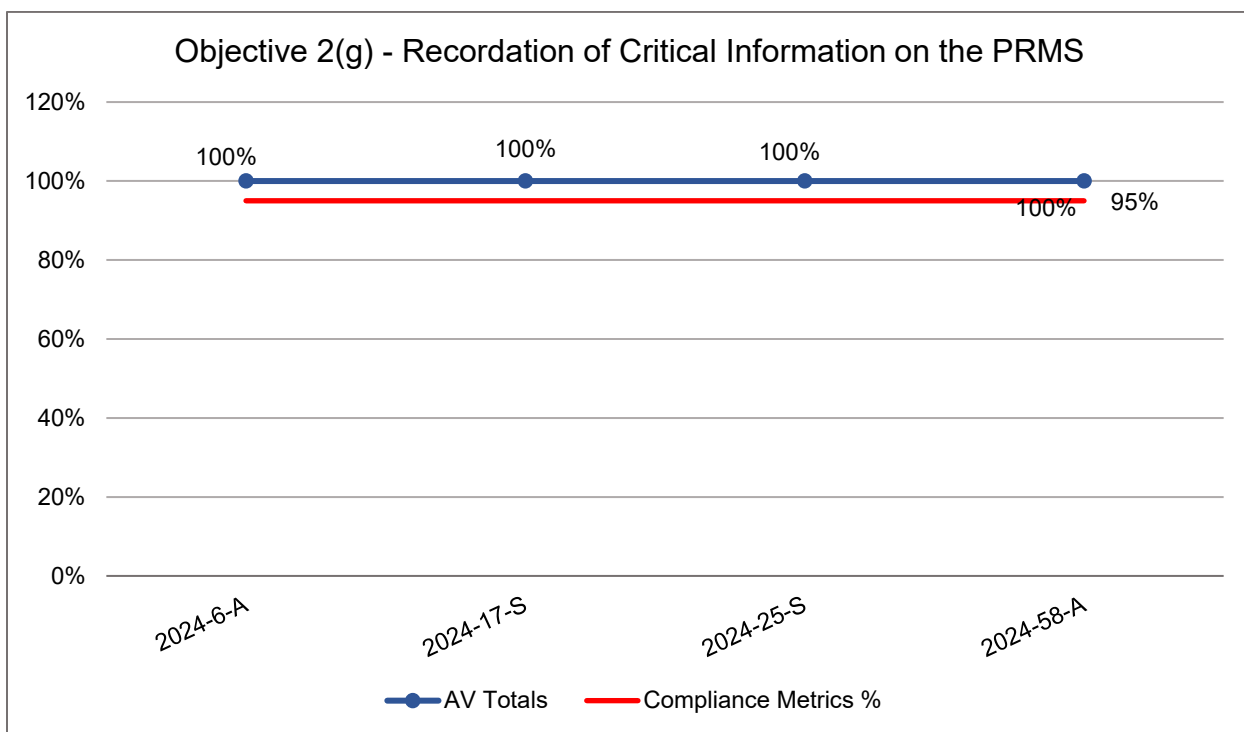
Procedures

The auditors reviewed the Service Comment module of PRMS to determine if all critical information from the Result of SCR form was accurately recorded in PRMS. Specifically, the auditors reviewed the critical information on the Result of SCR form and ensured it matched the information in PRMS. In addition, if there were any differences among the critical data recorded, the auditors determined which data was accurate.

³⁰ PRMS is formerly known as the Personal Performance Index (PPI).

The line graph below demonstrates the Discovery Unit was 100% compliant in all four audits. As a result, the Discovery Unit met the established compliance metrics for Objective 2(g) in all four audits.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
2	MANAGEMENT REVIEW AND OVERSIGHT					
2(g)	<i>Recordation of Critical Information in the PRMS</i>	100%	100%	100%	100%	95%



Findings

For the AV Stations combined, all 12 (100%) WCSCR investigations reviewed met the criteria for this objective because all critical information was accurately recorded on PRMS.

For Lancaster Station, all six (100%) WCSCR investigations reviewed met the criteria for this objective because all critical information was accurately recorded on PRMS.

For Palmdale Station, all six (100%) WCSCR investigations reviewed met the criteria for this objective because all critical information was accurately recorded on PRMS.

Recommendations

There are no recommendations because the Discovery Unit met the established compliance metrics.

Objective No. 2(h) – Recordation of Non-Critical Information in the PRMS

Criteria

Agreement Paragraph 142 states:

LASD-AV will ensure that PPI data is accurate and hold responsible AV personnel accountable for inaccuracies in any data entered.

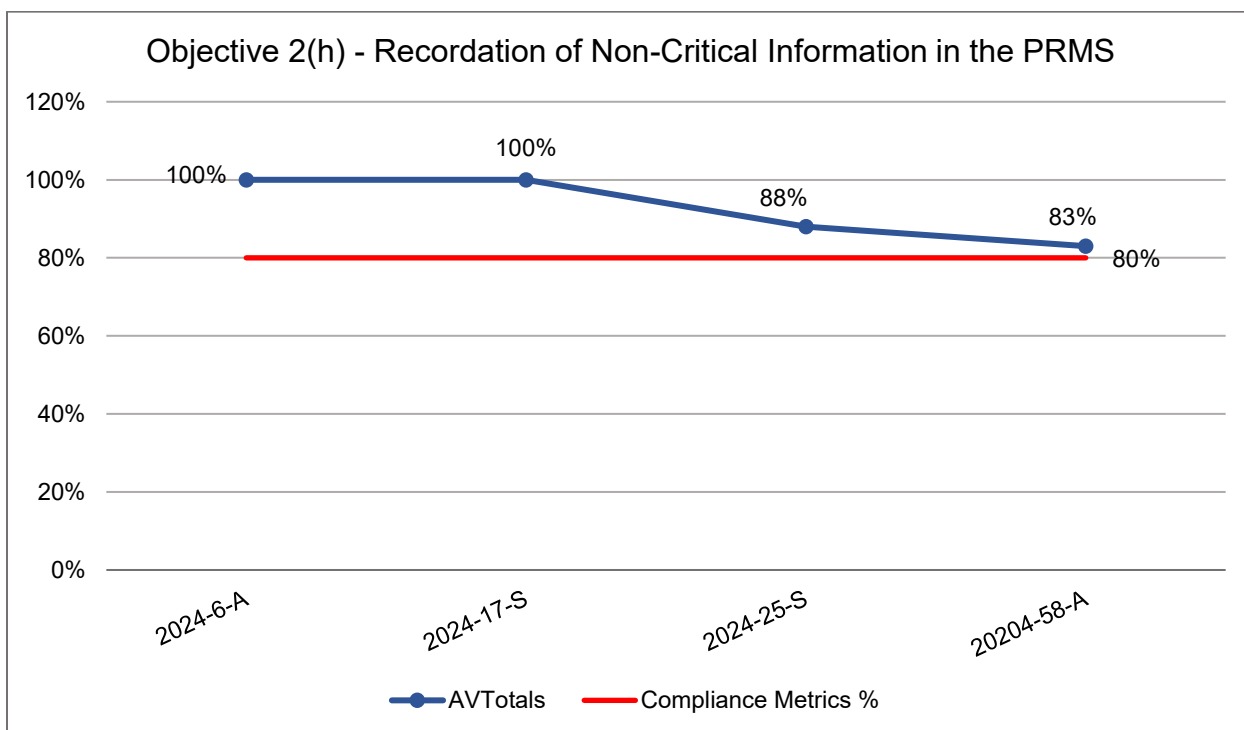
Per discussions with the MT, the compliance metrics for this sub-objective is 80%.

Procedures

The auditors reviewed the Service Comment module of PRMS to determine if all non-critical information from the Result of SCR form was accurately recorded in PRMS. Specifically, the auditors reviewed the non-critical information on the Result of SCR form and ensured it matched the information in PRMS. In addition, if there were any differences among the non-critical data recorded, the auditors determined which data was accurate.

The line graph below demonstrates the Discovery Unit was 100% compliant in the first audit and second audit. However, the Discovery Unit's compliance decreased in the third audit and this audit. The Discovery Unit met the established compliance metrics for Objective 2(h) in all four audits.

Obj. No.	Audit Objectives	2024-6-A	2024-17-S	2024-25-S	2024-58-A	Compliance Metrics %
2	MANAGEMENT REVIEW AND OVERSIGHT					
2(h)	<i>Recordation of Non-Critical Information in the PRMS</i>	100%	100%	88%	83%	80%



Findings

For the AV Stations combined, 10 (83%) of the 12 WCSCR investigations reviewed met the criteria for this objective because all non-critical information was accurately recorded on PRMS. The remaining two (17%) investigations did not meet the criteria for this objective because not all non-critical information was accurately recorded on PRMS. However, the Discovery Unit met the compliance metrics of 80% for this objective.

For Lancaster Station, four (67%) of the six WCSCR investigations reviewed met the criteria for this objective because all non-critical information was accurately recorded on PRMS. The remaining two (33%) investigations did not meet the criteria for this objective because not all non-critical information was accurately recorded on PRMS.

For Palmdale Station, all six (100%) WCSCR investigations reviewed met the criteria for this objective because all non-critical information was accurately recorded on PRMS.

Specifically:

L-2: The Department member who took the complaint and completed the review was not accurately recorded on the PRMS.

L-6: The incident date was not accurately recorded on the PRMS.

Recommendations

There are no recommendations because the Discovery Unit met the established compliance metrics.

CONCLUSION

For this audit, the AV Stations effectively applied the procedures mandated by the Agreement and met the compliance metrics for six of the 18 applicable sub-objectives. Specifically:

- 1(d) – Witness Interview Requirements
- 1(g) – Material Inconsistency Identified and Explained When Possible
- 1(i) – Uninvolved Investigator
- 2(a) – Statement Discarded Due to Criminal History
- 2(g) – Recordation of Critical Information in PRMS
- 2(h) – Recordation of Non-Critical Information in the PRMS

This audit also identified the following sub-objectives where the AV Stations obtained the three lowest compliance rates ranging from 0% to 50%:

- 1(a) – Identify Everyone at the Scene
- 1(j) – Collect All Evidence
- 1(k) – Thoroughness of Investigation
- 2(c) – Preponderance of Evidence
- 2(d) – Timeliness of Adjudication
- 2(e) – Recordation of Critical Information on the Result of SCR Form

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 achieve their goals of adhering to the Agreement and to 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

- a) **Identify Everyone at the Scene:** It is recommended proper identification of all individuals at the incident scene be documented on the WCSCR, Service Comment Review, and a complaint investigation checklist. This checklist should be created by the Compliance Unit and utilized during the WCSCR investigation. It should detail the requirements of the Agreement and the compliance metrics. Additionally, Department policy requirements should be added as necessary. This checklist should be available to both AV Stations and required for each WCSCR investigation. It should remain attached to the investigation package and be evaluated during the management review and oversight process.
- b) **Interviews Conducted Separately:** To ensure compliance metrics are met, all investigative interviews must be conducted separately and documented within the investigation. This will allow the reporting and involved parties, witnesses, and involved deputies the opportunity to speak freely and honestly about the details of the complaint and provide critical information. It is recommended the justification as to why an interview was not conducted separately be documented on the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a).
- c) **Interview Complainant In-Person:** When conducting WCSCR investigations, the interview with the complainant must be conducted in-person. Meeting with the complainant in-person allows them to feel “heard” and promotes the Department’s efforts to fully engage when collecting the necessary details to complete the investigation. However, in accordance with the compliance metrics, if this is not practical, the supervisor conducting the interview must document the reason it was impracticable. In addition, the complainant should be asked if the interview can be conducted in-person and if they decline, this serves as justification for not conducting an in-person interview. It is recommended the justification as to why it was not practical to conduct an interview in-person be documented on the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a).

- e) **Additional Interviews Conducted as Needed:** It is recommended investigators always conduct and document the additional interviews needed to ensure that all the necessary information is collected and supported by sufficient and reliable sources in the Service Comment Review and on the complaint investigation checklist as recommended in Objective 1(a).
- h) **Record Entire Interviews:** It is recommended the Department conduct recurrent briefings with investigators regarding the recording of complainant interviews in their entirety and documenting the reason in their investigation for not recording the interview. This information should be included in the complaint investigation checklist as recommended in Objective 1(a).
- j) **Collect All Evidence:** It is recommended the collection, organization, and review of all evidence be documented on the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a). The evidence collected must be sufficient and relevant to formulate and support credible conclusions for each allegation.
- k) **Thoroughness of Investigation:** It is recommended all related evidence, including but not limited to complainant and witness interviews, booking paperwork, crime and supplemental reports, and BWC recordings the investigators consider when conducting an investigation to formulate and support logical conclusions for each allegation be documented on the Service Comment Review and on the complaint investigation checklist recommended in Objective 1(a).

Objective 2 – Management Review and Oversight

- b) **Deputy Statement Given Preference:** In keeping with the principles of a thorough, complete investigation, the investigator should not give automatic preference to the deputy's statement over the non-deputy. Investigations should demonstrate the use of all necessary documentation, including witness statements, a review of BWC recording, or other recording devices as the basis to arrive at conclusions. The adjudication should reflect as such. It is recommended that Field Operations Support Services revise the Service Comment Review investigation format, which is documented on a SH-AD-711, to include the following statement, "Department supervisors shall conduct complaint investigations fairly and impartially to avoid the appearance of bias for deputy personnel." This statement should be added directly under the "Involved Employee Statement" and the "Employee Witness Statement" sections of the investigation.

- c) **Preponderance of Evidence:** It is recommended Unit Commanders thoroughly review WCSCR investigations to adjudicate the investigations based upon the preponderance of the evidence standard. NPD Commanders should take documented corrective action when a Unit Commander fails to properly review an investigation.
- d) **Timeliness of Adjudication:** It is recommended the Department implement the revised timelines in the proposed draft SCR Handbook. The expanded timelines may help ensure investigations are thorough and complete prior to submission to the Unit Commander as well as to NPD. In addition, it is recommended the AV Stations conduct an analysis to determine the main cause of the delays in completing the investigations in a timely manner. It is also recommended an internal tracker is developed to monitor the completion status of the WCSCR investigation at each level of review.
- e) **Recordation of Critical Information on the Result of SCR Form:** It is recommended all levels of personnel responsible for processing complaints, from initial intake to final disposition, take ownership of all critical information obtained in the WCSCR. NPD Commanders must take documented corrective actions when inaccuracies are not corrected.
- f) **Recordation of Non-Critical Information on the Result of SCR Form:** It is recommended written guidelines are established for unit-level Operations staff who are tasked with reviewing and distributing the completed WCSCR packets. Additional training on accurately transcribing all “non-critical information” on the Result of Service Comment Review would assist in correcting errors currently found in completed packets. It is also recommended a second level of review is implemented once the form is completed by Operations staff.

Lastly, it is recommended the Result of Service Comment Review should indicate who completed the form up to the final approval stages. Adding a first and second level signature line would help establish accountability and ensure accurate information in PRMS.

DEPARTMENT APPLICATIONS

- Evidence.com
- Performance Recording and Monitoring System

REFERENCES

- Antelope Valley Monitoring Team Monitor's Second Audit of Community Complaints (December 2020)
- Antelope Valley Settlement Agreement Compliance Metrics (October 2019)
- Manual of Policy and Procedures Sections:
 - 3-01000.13, Professional Conduct – Core Values (January 2013)
 - 3-01/040.62, Use of Sheriff's Intellectual Property/Star/Logos (December 2013)
 - 3-04/010.05, Procedures for Department Service Reviews (December 2013)
- Proposed Draft Service Comment Report Handbook (August 2022)
- Service Comment Report Handbook (June 2011)
- United States Department of Justice – Los Angeles County Sheriff's Department Antelope Valley Settlement Agreement, Case Number CV 15- 03174 (April 2015)

Views of Responsible Officials

On March 10, 2025, Palmdale Station command staff submitted a response regarding the noted findings to the AAB. Of the 19 sub-objectives, 11 sub-objectives had findings. Palmdale Station agreed with the findings for eight sub-objectives but did not agree with the findings for three sub-objectives. However, the auditors determined the findings for these three sub-objectives were justified.


Specifically:

- 2(b) – Deputy Statement Given Preference
- 2(c) – Preponderance of Evidence
- 2(e) – Recordation of Critical Information on the Result SCR Form

On March 21, 2025, Lancaster Station command staff submitted a response regarding the noted findings to the AAB. Of the 19 sub-objectives, 11 sub-objectives had findings. Lancaster Station agreed with the findings for two sub-objectives but did not agree with some of the findings for nine sub-objectives. However, the auditors determined the findings for these nine sub-objectives were justified. Specifically:

- 1(a) – Identify Everyone at the Scene
- 1(b) – Interviews Conducted Separately
- 1(c) – Interview Complainant In-Person
- 1(e) – Additional Interviews Conducted as Needed
- 1(h) – Record Entire Interviews
- 1(j) – Collect All Evidence
- 1(k) – Thoroughness of Investigation
- 2(c) – Preponderance of Evidence
- 2(e) – Recordation of Critical Information on the Result SCR Form

The AAB presented the final audit report to the Division Director, Office of Constitutional Policing.

 12/19/2025

MARIA G. KUEHL DATE
Acting Captain
Audit and Accountability Bureau
Los Angeles County Sheriff's Department