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# LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

## Part II of Public Complaints Audit: Investigation of Public Complaints Antelope Valley Stations Project No. 2025-12-A

Prepared By:

**Audit and Accountability Bureau**



2025

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

**Part II of Public Complaints Audit:  
Investigation of Public Complaints  
Antelope Valley Stations  
Project No. 2025-12-A**

**AUDIT REPORT**

**PURPOSE**

The Audit and Accountability Bureau (AAB) conducted the Public Complaints Audits under the authority of the Los Angeles County Sheriff's Department (LASD or the Department), pursuant to the United States Department of Justice (US-DOJ) Antelope Valley (AV) Settlement Agreement (Agreement).<sup>1</sup> The purpose of Part II audits (2025-2-A, and 2025-12-A) was to determine whether the investigation of public complaints complied with the Agreement. Specifically, the audit assessed whether Lancaster and Palmdale Stations (AV Stations) complied with paragraphs 131, 133 through 137, 140, and 149 of the Agreement.

As mandated by the Agreement, the primary objectives of the audit were to ensure whether the AV Station supervisors conducted thorough investigations, leading to reliable and well-supported conclusions. These objectives helped assess the Department's transparency practices with the public, as well as its compliance with established policies and the terms of the Agreement.

The results from each audit report were based on the AV Stations' adherence to the Agreement's provisions, the US-DOJ and Monitoring Team (MT) established Agreement Compliance Metrics (compliance metrics), and Department policies. The AAB's audit findings and recommendations provided the MT with essential data for consideration to use toward compliance<sup>2</sup> and assessed whether the Department met its obligations under the Agreement.

Paragraph 140 of the Agreement states:

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

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

<sup>2</sup> Compliance when mentioned throughout the report refers to whether the AV Stations met the established compliance metrics.

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Additionally, Paragraph 149 of the Agreement states:

*The Monitor shall... determine whether LASD has implemented and continues to comply with the material<sup>3</sup> requirements of this Agreement... Where appropriate, the monitor will make use of audits conducted by the [Audit and Accountability Bureau] taking into account the importance of internal auditing capacity and independent assessment of this agreement.*

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

The Public Complaints Audits were conducted in the following manner:

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

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

**Project Numbers, Due Dates, and Population Time Periods**

Project No.	Projected Due Date	Population Time Period
2025-2-A	April 2025	July 1, 2024, through July 31, 2024
2025-12-A	September 2025	September 1, 2024, through October 31, 2024

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

<sup>3</sup> Per the MT, “material” refers to relevant and important information that is generally significant enough to determine or affect the outcome of an issue.

<sup>4</sup> The GAGAS, also known as the Yellow Book, is issued by the Comptroller General of the United States through the U.S. Government Accountability Office and refers to *Government Auditing Standards*, July 2018 Revision, Technical Update April 2021.

## **BACKGROUND**

On April 28, 2015, the County of Los Angeles, the Department, and the US-DOJ entered into the Agreement with the goal of ensuring police services are provided to the AV community in a manner that fully complies with the Constitution and the laws of the United States. The Department is responsible for implementing the mandated stipulations of the Agreement, ensuring both public and deputy safety, while fostering renewed public trust in the LASD.

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

## **OBJECTIVES, SCOPE, AND METHODOLOGY**

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

### **Audit Scope**

The scope of this audit evaluated the investigation of public complaints. The AAB carefully developed the audit objectives, scope, and methodology, focusing on the Agreement and the established compliance metrics. The Department's compliance was measured against the compliance metrics, along with additional direction provided by the MT to ensure the appropriate audit test work was conducted and relevant audit documentation was collected and analyzed.

### **Audit Population and Sampling**

The AAB specifically designed the audits to provide the MT with essential data for consideration to use toward compliance and assessed whether the Department is meeting its obligations under the Agreement. Parts II and III of the Public Complaints Audit, along with Objective No. 3 – Initiation and Classification of Complaints for Part I of the Public Complaints Audit, used the same audit population.

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

The auditors evaluated completed<sup>7</sup> investigations. This allowed for the evaluation of the effectiveness of the management review process. The population consisted of all Watch Commander’s Service Comment Report (WCSCR) investigations initiated from September 1, 2024, through October 31, 2024.

Lancaster Station had a total of 27 WCSCR investigations recorded in PRMS. Of these, five were commendations. At the time of the audit planning, two outstanding WCSCR investigations (L-18 and L-19) had not been approved by NPD, resulting in a final audit population of 22 WCSR investigations for Lancaster Station.

Palmdale Station had a total of 23 WCSCR investigations recorded in PRMS. Of these, seven were commendations. The remaining 16 investigations were evaluated as the final audit population for Palmdale Station.

The combined audit population included 38 completed WCSCR investigations; 22 from Lancaster Station and 16 from Palmdale Station.

Using a one-tailed statistical test with a 95% confidence level and a 4% error rate, the auditors selected a statistically valid random sample of incidents for the audit period. As a result, 31 WCSCR investigations were reviewed for this audit; 17 from Lancaster Station and 14 from Palmdale Station. In addition to these WCSCR investigations, the auditors reviewed the two previously outstanding investigations from Lancaster Station. Accordingly, a total of 33 WCSCR investigations were reviewed for this audit. The investigations initiated and audited are indicated below:

**Audit Population**

Audit Project No.	WCSCR Investigations Initiated		WCSCR Investigations Audited	
	Lancaster	Palmdale	Lancaster	Palmdale
2025–2–A	15	16	7	9
2025–12–A	22	16	19	14

**Audit Procedures**

<sup>5</sup> The PRMS is a web-based application that systematically records data relevant to incidents involving uses of force, shootings, and commendations/complaints regarding Sheriff’s Department personnel. In addition, PRMS tracks the progress of administrative investigations, civil claims and lawsuits, discovery motions, employee commendations, preventable traffic collisions, custody complaints, and special conditions that the Department handles.

<sup>6</sup> Report navigator is a database used by the Department to identify current and overdue complaint investigations.

<sup>7</sup> Completed refers to the approval of investigations at the North Patrol Division (NPD) level.

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

The auditors conducted detailed testing using audit tools designed for various audit objectives. The auditors analyzed the information gathered and documented their findings on audit work papers<sup>8</sup>, which underwent further levels of review.

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

### Summary of Findings

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

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

#### Summary of Compliance Metrics Findings

Obj. No.	Audit Objectives	Lancaster %	Palmdale %	AV Total	Compliance Metrics %
<b>1</b>	<b>INVESTIGATION OF COMPLAINTS</b>				
1(a)	<i>Identify Everyone at the Scene</i>	84%	79%	82%	85%
1(b)	<i>Interviews Conducted Separately</i>	100%	100%	100%	85%
1(c)	<i>Interview Complainant in-Person</i>	95%	93%	94%	85%
1(d)	<i>Witness Interview Requirements</i>	100%	100%	100%	85%
1(e)	<i>Additional Interviews Conducted as Needed</i>	95%	100%	97%	85%
1(f)	<i>Limited English Proficiency (LEP)</i>	0%	100%	50%	85%
1(g)	<i>Material Inconsistency Identified and Explained When Possible</i>	100%	100%	100%	85%
1(h)	<i>Record Entire Interviews</i>	95%	100%	97%	92%
1(i)	<i>Uninvolved Investigator</i>	100%	100%	100%	90%
1(j)	<i>Collect All Evidence</i>	100%	100%	100%	95%
1(k)	<i>Reliability of the Investigation</i>	95%	100%	97%	92%

<sup>8</sup>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.

## Detailed Findings

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

### Objective No. 1 – Investigation of Public Complaints

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

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

##### Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraph 134 (October 2019), Section 3B (5) states:

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

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

5. *Personnel complaint investigators:*

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

##### Procedures

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

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

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

## Findings

For the AV Stations combined, 27 (82%) of the 33 WCSCR investigations met the criteria for this objective because everyone at the scene was identified. The remaining six (18%) WCSCR investigations did not meet the criteria for this objective because not everyone at the scene was identified.

For Lancaster Station, 16 (84%) of the 19 WCSCR investigations met the criteria for this objective because all individuals at the scene were identified. The remaining three (16%) WCSCR investigations did not meet the criteria for this objective because not everyone at the scene was identified.

For Palmdale Station, 11 (79%) of the 14 WCSCR investigations met the criteria for this objective because all individuals at the scene were identified. The remaining three (21%) WCSCR investigations did not meet the criteria for this objective because not everyone at the scene was identified.

Specifically:

**L-4<sup>9</sup>:** During a call for service regarding an assault with a deadly weapon, the R/P, who was the I/P's father, alleged the involved Department members denied the I/P medical attention and improperly arrested him. The BWC recordings showed the I/P's mother standing nearby while he was being interviewed by one of the involved Department members. The I/P's mother should have been listed as a witness in the witness section of the WCSCR or addressed in the Service Comment Review.

**L-8:** During a call for service regarding a firearm threat, the R/P alleged that one of the three involved Department members was dishonest and improperly arrested him, and the other two abused their authority by improperly arresting him. The BWC recordings showed there were also three Department members present at the scene during the time one of the complaint incidents took place. They were standing next to one of the involved Department members when the R/P signed the search entry waiver form. These Department members should have been listed as witnesses in the witness information section of the WCSCR or addressed in the Service Comment Review.

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<sup>9</sup> L refers to Lancaster Station and the number corresponds to the selected sample within the audit population.

**L-18:** During a call for service regarding a possible hit and run traffic collision, the R/P alleged the involved Department member was rude, confrontational, and refused to arrest the other party. The BWC recordings showed there were four civilians present when the involved Department member was investigating the incident. One civilian was the R/P's passenger, two were colleagues of the other party, and the fourth was an unknown female. These civilians should have been listed as witnesses in the witness information section of the WCSCR or addressed in the Service Comment Review.

**P-8<sup>10</sup>:** During a felony traffic stop regarding a stolen vehicle, the R/P alleged the involved Department member threw him down to the ground as he ran away from the stolen vehicle. The BWC recordings showed a passenger in the stolen vehicle, who was also present at the scene during the time the complaint incident took place. The passenger should have been listed as a witness in the witness section of the WCSCR or addressed in the Service Comment Review. The investigator also identified two Department members who were present at the scene. However, he did not provide the reason why they were not considered as witnesses.

**P-10:** During a traffic stop regarding missing license plates, the R/P alleged that one of the three involved Department members was very rude and unprofessional, and all three racially profiled and improperly arrested him. The BWC recordings showed there were three Department members assisting who were present at the scene during the time the complaint incident took place. These Department members should have been listed as witnesses in the witness information section of the WCSCR or addressed in the Service Comment Review.

**P-14:** During a traffic stop regarding the vehicle's expired registration, the R/P alleged one of the two involved Department members forced him out of the vehicle without probable cause, was unprofessional, and both involved Department members broke the vehicle's glove box while conducting a vehicle search. The BWC recordings showed there were two more Department members present when the glove box was forced open. These Department members should have been listed as witnesses in the witness information section of the WCSCR or addressed in the Service Comment Review.

### Recommendations

It is recommended that the investigators make every effort to identify all individuals involved in the complaint incident, as well as anyone who was present at the scene when the allegation occurred. This information must be documented in the information section of the WCSCR or addressed in the Service Comment Review. If individuals present at the scene are not listed as witnesses, investigators must provide a detailed justification in the Service Comment Review.

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<sup>10</sup> P refers to Palmdale Station and the number corresponds to the selected sample within the audit population.

Additionally, the Compliance Unit should revise the WCSCR checklist to provide the investigators with clear and detailed guidance on who should be identified and how those individuals should be documented in both the information section of the WCSCR and the Service Comment Review. Lastly, when completing the information section of the WCSCR and the Service Comment Review, it is recommended that the investigators consistently use the revised WCSCR checklist to help ensure the Department remains compliant.

## **Objective No. 1(b) – Interviews Conducted Separately**

### Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraph 137 (October 2019), Section 3B (1) states:

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

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

1. *All interviews are conducted separately.*

### Procedures

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

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

### Findings

For the AV Stations combined, 33 (100%) of the 33 WCSCR investigations met the criteria for this objective because all interviews were conducted separately.

For Lancaster Station, all 19 (100%) WCSCR investigations met the criteria for this objective because all interviews were conducted separately.

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

### Recommendations

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

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

### Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigations, Paragraph 136 (October 2019), Section 3B (2) states:

3. *LASD will be deemed in substantial outcomes compliance when it:*
  - B. *At least 85% of AV's public personnel complaint investigations meet the investigative requirements identified in the SA. This will involve a qualitative and quantitative evaluation of the following SA requirements:*
    2. *Each complainant is interviewed in-person, when practical, and the investigation identifies the reason when it is not.*

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

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

### Procedures

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

### Findings

For the AV Stations combined, 31 (94%) of the 33 WCSCR investigations met the criteria for this objective because the complainants were interviewed in-person. The remaining two (6% ) WCSCR investigations did not meet the criteria for this objective because the complainants were either not interviewed in-person or not interviewed at all.

For Lancaster Station, 18 (95%) of the 19 WCSCR investigations met the criteria for this objective because the complainant was interviewed in-person. The remaining one (5%) WCSCR investigations did not meet the criteria for this objective.

For Palmdale Station, 13 (93%) of the 14 WCSCR investigations met the criteria for this objective because the complainant was interviewed in-person. The remaining one (7%) WCSCR investigations did not meet the criteria for this objective.

Specifically:

**L-14:** During a call for service regarding a possible burglary, the R/P alleged that one of the two involved Department members unlawfully searched his wallet, used excessive force by pointing a firearm at him, and the other involved Department member was unprofessional because he made inappropriate statements. The investigator called the R/P to conduct his interview but did not document the reason why an in-person interview was not practical. Given the intake interview was unreliable because it was not recorded, the investigator should have offered the R/P the option of an in-person interview.

**P-5:** During a call for service regarding a welfare check on the R/P's children, he alleged the involved Department member was rude to him. Based on the available interview recordings, the interview was conducted by phone. Per the investigator, the R/P stated he wanted to make a complaint, and the investigator proceeded to interview him over the phone. However, the investigator did not document any reason why an in-person interview was not practical, nor did he offer the R/P the option of an in-person interview.

### Recommendations

Although the AV Stations met the compliance requirements for this objective, it is important to incorporate the following guidance to enhance investigative practices. To ensure accountability and clarity, both the offer to conduct an in-person interview and the complainant's response should be recorded and documented whenever practical. Investigators must also review the interview recordings to ensure they are consistent with the information documented in the Service Comment Review.

## **Objective No. 1(d) – Witness Interview Requirements**

### Criteria

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

3. *LASD will be deemed in substantial outcomes compliance when it:*
  - B. *At least 85% of AV's public personnel complaint investigations meet the investigative requirements identified in the SA. This will involve a qualitative and quantitative evaluation of the following SA requirements:*
    4. *All witnesses, including deputies who were involved in or witnessed the incident, provide a written statement or are interviewed in person. Non-Department witnesses may be interviewed by phone, if practical.*

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

### Procedures

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

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

### Findings

For the AV Stations combined, all 33 (100%) WCSCR investigations met the criteria for this objective because all material witnesses were interviewed.

For Lancaster Station, all 19 (100%) WCSCR investigations met the criteria for this objective because all material witnesses were interviewed.

For Palmdale Station, all 14 (100%) WCSCR investigations met the criteria for this objective because all material witnesses were interviewed.

### Recommendations

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

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

### Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraph 131 (October 2019), Section 3B (3) states:

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

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

### Procedures

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

### Findings

For the AV Stations combined, 32 (97%) of the 33 WCSCR investigations met the criteria for this objective because all additional necessary interviews were conducted. The remaining one (3%) WCSCR investigation did not meet the criteria for this objective because not all necessary interviews were conducted.

For Lancaster Station, 18 (95%) of the 19 WCSCR investigations met the criteria for this objective because all necessary interviews were conducted. The remaining one (5%) WCSCR investigation did not meet the criteria for this objective.

For Palmdale Station, all 14 (100%) WCSCR investigations met the criteria for this objective because all necessary interviews were conducted.

Specifically:

**L-1:** During a traffic stop for driving while using a cell phone, the R/P alleged that one of the two involved Department members opened the rear passenger-side door without permission. Based on the investigator's recorded phone interview, the auditors also noted the R/P alleged his vehicle was towed due to his race. However, the investigator did not list the allegation of discrimination in the WCSCR, nor was it addressed in the Service Comment Review. Consequently, the investigator did not conduct the interviews regarding the R/P's allegation of racial bias.

#### Recommendations

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

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

### Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraph 137 (October 2019), Section 3B (6) states:

3. *LASD will be deemed in substantial outcomes compliance when it:*
  - B. *At least 85% of AV's public personnel complaint investigations meet the investigative requirements identified in the SA. This will involve a qualitative and quantitative evaluation of the following SA requirements:*
    6. *When a personnel complaint investigation requires an interpreter, an interpreter not involved in the underlying complaint is used to take statements or conduct interviews of any Limited English Proficiency complainant or witness.*

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

### Procedures

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

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

### Findings

For the AV Stations combined, one (50%) of the two WCSCR investigations met the criteria for this objective because an interpreter was provided for the R/P who required one. The remaining one (50%) WCSCR investigation did not meet the criteria because the R/P required an interpreter but there was no recording or documentation that an interpreter was used during the investigator's interview.

For Lancaster Station, an interpreter was required for one of the 19 WCSCR investigations. None (0%) WCSCR investigation met the criteria for this objective because the R/P required an interpreter but there was no recording or documentation that an interpreter was used during the investigator's interview.

For Palmdale Station, an interpreter was required for one of the 14 WCSCR investigations. One (100%) WCSCR investigation met the criteria for this objective because an interpreter was provided for the R/P who required one.

Specifically:

**L-13:** During a call for service regarding the R/P's request to file an embezzlement report, the R/P alleged the Department member (deputy who authored the incident report) took an unreasonably time to complete the report. The BWC recordings of the incident showed the R/P spoke only Spanish. Subsequently, the R/P went to Lancaster Station to file a complaint and met with the investigator, who speaks only English, at the front counter. According to the SCR, the investigator stated, he "errantly" did not record his conversation with the R/P. Since the interview was not recorded, the auditors could not verify whether the investigator complied with the interpreter requirement. The investigator should have documented in the SCR whether an interpreter was needed to conduct his interview, and if so, whether the interpreter was not involved in the complaint incident.

### Recommendations

In instances when a complainant requires an interpreter, but the interview is not recorded, investigators must document in the Service Comment Review whether an interpreter was offered, whether one was used, and whether the interpreter was not involved in the underlying complaint.

It is also recommended that the Compliance Unit revise the WCSCR checklist to include a step verifying that interpreter use is properly documented for LEP complainants and material witnesses. Lastly, when completing the information section of the WCSCR and the Service Comment Review, it is recommended that the investigators consistently use the revised WCSCR checklist to help ensure the Department remains compliant.

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

### Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (October 2019), Section 3B (9) states:

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

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

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

### Procedures

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

### Findings

For the AV Stations combined, all 33 (100%) WCSCR investigations met the criteria for this objective because no material inconsistencies were identified.

For Lancaster Station, all 19 (100%) WCSCR investigations met the criteria for this objective because no material inconsistencies were identified.

For Palmdale Station, all 14 (100%) WCSCR investigations met the criteria for this objective because no material inconsistencies were identified.

### Recommendations

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

## **Objective No. 1(h) – Record Entire Interviews**

### Criteria

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

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

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

### Procedures

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

### Findings

For the AV Stations combined, 32 (97%) of the 33 WCSCR investigations met the criteria for this objective because all complainant interviews were recorded in their entirety. The remaining one (3%) WCSCR investigation did not meet the criteria for this objective because the complaint interview was not recorded, and the documented reason for not recording was insufficient.

For Lancaster Station, 18 (95%) of the 19 WCSCR investigations met the criteria for this objective because all complainant interviews were recorded in their entirety.

For Palmdale Station, all 14 (100%) WCSCR investigations met the criteria for this objective because all complainant interviews were recorded in their entirety.

Specifically:

**L-13:** Although the investigator documented a reason for not recording the interview with the R/P, the explanation that it was “errantly” not recorded is insufficient, as it does not constitute a sufficient or justifiable reason.

### Recommendations

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

## **Objective No. 1(i) – Uninvolved Investigator**

### Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraph 133 (October 2019), Section 3C states:

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

*C. At least 90% of AV's public personnel complaint investigations are conducted by a supervisor who was not involved in the incident 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. In such cases, the rationale must be documented in the investigation. When the complaint involves an allegation of serious misconduct, an uninvolved supervisor shall conduct the investigation.

### Procedures

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

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

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

### Findings

For the AV Stations combined, all 33 (100%) WCSCR investigations met the criteria for this objective because the investigating supervisor was not involved in the incident.

For Lancaster Station, all 19 (100%) WCSCR investigations met the criteria for this objective because the investigating supervisor was not involved in the incident.

For Palmdale Station, all 14 (100%) WCSCR investigations met the criteria for this objective because the investigating supervisor was not involved in the incident.

### Recommendations

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

## **Objective No. 1(j) – Collect All Evidence**

### Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Management Oversight and Adjudication, Paragraph 131 (October 2019), Section 3D states:

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

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

### Procedures

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

### Findings

For the AV Stations combined, all 33 (100%) WCSCR investigations met the criteria for this objective because all relevant evidence was considered, and credibility determinations were made based upon that evidence.

For Lancaster Station, all 19 (100%) WCSCR investigations met the criteria for this objective because all relevant evidence was considered, and credibility determinations were made based upon that evidence.

For Palmdale Station, all 14 (100%) WCSCR investigations met the criteria for this objective because all relevant evidence was considered, and credibility determinations were made based upon that evidence.

### Recommendations

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

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

### Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraph 131 (October 2019), Section 3A states:

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

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

### Procedures

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

### Findings

For the AV Stations combined, 32 (97%) of the 33 WCSCR investigations met the criteria for this objective because the complaint investigations were as thorough as necessary to reach reliable and complete findings. The remaining one (3%) WCSCR investigation did not meet the criteria.

For Lancaster Station, 18 (95%) of the 19 WCSCR investigations met the criteria for this objective because the complaint investigations were as thorough as necessary to reach reliable and complete findings. The remaining one (5%) WCSCR investigation did not meet the criteria.

For Palmdale Station, all 14 (100%) WCSCR investigations met the criteria for this objective because the complaint investigations were as thorough as necessary to reach reliable and complete findings.

Specifically:

**L-1:** The investigator did not gather all the necessary evidence to conduct a thorough investigation, as it did not include an investigation of the R/P's allegation that the involved Department members towed his vehicle due to his race. Per the recorded intake interview, the R/P stated he believed he was stopped because he is Black. This allegation was not listed in the WCSCR and was not addressed in the Service Comment Review.

Recommendations

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

## **CONCLUSION**

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

The AAB will continue to conduct audits to uphold transparency and accountability, assess progress, and provide recommendations for ongoing improvement at the AV Stations. These efforts are essential in assisting the AV Stations to achieve their goals of adhering to the Agreement and meeting the established compliance metrics. By systematically evaluating operational practices, the AAB is committed to fostering a culture of continuous improvement, ultimately enhancing the effectiveness and integrity of operations within the AV Stations.

## **SUMMARY OF RECOMMENDATIONS**

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

### **Objective 1 – Investigation of Complaints**

- a) **Identify Everyone at the Scene:** It is recommended that the investigators make every effort to identify all individuals involved in the complaint incident, as well as anyone who was present at the scene when the allegation occurred. This information must be documented in the information section of the WCSCR or addressed in the Service Comment Review. If individuals present at the scene are not listed as witnesses, investigators must provide a detailed justification in the Service Comment Review.

Additionally, the Compliance Unit should revise the WCSCR checklist to provide the investigators with clear and detailed guidance on who should be identified and how those individuals should be documented in both the information section of the WCSCR and the Service Comment Review. Lastly, when completing the information section of the WCSCR and the Service Comment Review, it is recommended that the investigators consistently use the revised WCSCR checklist to help ensure the Department remains compliant.

- f) **Limited English Proficiency:** In instances where a complainant requires an interpreter but the interview is not recorded, investigators must document in the Service Comment Review whether an interpreter was offered, whether one was used, and whether the interpreter was not involved in the underlying complaint.

It is also recommended that the Compliance Unit revise the WCSCR checklist to include a step verifying that interpreter use is properly documented for LEP complainants and material witnesses. Lastly, when completing the information section of the WCSCR and the Service Comment Review, it is recommended that the investigators consistently use the revised WCSCR checklist to help ensure the Department remains compliant

## **FOLLOW-UP PROCEDURES**

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

## **DEPARTMENT APPLICATIONS**

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

## **REFERENCES**

- United States Department of Justice – Los Angeles County Sheriff's Department Antelope Valley Settlement Agreement, Case Number CV 15-03174 (April 2015)
- Antelope Valley Settlement Agreement Compliance Metrics (October 2019)
- Antelope Valley Monitoring Team Monitor's Second Audit of Community Complaints (December 2020)
- Manual of Policy and Procedures Section:
  - 3-04/010.05, Procedures for Department Services Reviews (December 2013)
  - 3-04/010.25, Personnel Complaints (October 2014)
- Proposed Draft Service Comment Review Handbook (August 2022)
- Administrative Investigations Handbook (October 2005)

### Views of Responsible Officials

On October 02, 2025, Palmdale Station command staff submitted a response to the AAB concurring with the corresponding audit findings. On October 8, 2025, Lancaster Station command staff submitted a response to the AAB concurring with the corresponding audit findings. The AAB presented the final audit report to the Division Director, Office of Constitutional Policing.



12/08/25

GEOFFREY N. CHADWICK

DATE

Captain

Audit and Accountability Bureau

Los Angeles County Sheriff's Department