



ROBERT G. LUNA, SHERIFF

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

Part III of Public Complaints Audit: Adjudication of Public Complaints Antelope Valley Stations Project No. 2025-13-A

Prepared By:

Audit and Accountability Bureau



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

**Part III of Public Complaints Audit:
Adjudication of Public Complaints
Antelope Valley Stations
Project No. 2025-13-A**

AUDIT REPORT

PURPOSE

The Audit and Accountability Bureau (AAB) conducted the Public Complaints Audits under the authority of the Los Angeles County Sheriff's Department (LASD or the Department), pursuant to the United States Department of Justice (US-DOJ) Antelope Valley (AV) Settlement Agreement (Agreement)¹. The purpose of Part III audits (2025-3-A and 2025-13-A) was to determine whether the adjudication of public complaints complied with the Agreement. Specifically, the audit assessed whether Lancaster and Palmdale Stations (AV Stations) complied with paragraphs 128, 130, 131, 133 through 137, 140, and 142 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. In addition, the Agreement mandates a review of management's role in overseeing the adjudicative process. 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 compliance² and assessed whether the Department met its obligations under the Agreement.

Paragraph 140 of the Agreement states:

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

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

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

Additionally, Paragraph 149 of the Agreement states:

The Monitor shall... determine whether LASD has implemented and continues to comply with the material³ requirements of this Agreement... Where appropriate, the monitor will make use of audits conducted by the [Audit and Accountability Bureau] taking into account the importance of internal auditing capacity and independent assessment of this agreement.

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

The Public Complaints Audits were conducted in the following manner:

Part	Audit
I	Availability and Acceptance of Complaint Information & 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
2025-3-A	April 2025	July 1, 2024, through July 31, 2024
2025-13-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)⁴. The AAB determined whether the evidence obtained was sufficient and appropriate to provide a reasonable basis for the findings based on the audit objectives.

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

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

BACKGROUND

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

The AAB was authorized by the Sheriff of Los Angeles County, the US-DOJ, and the MT to conduct audits of the Department. To improve efficiency and effectiveness, the AAB shifted its audit approach from conducting full-scale audits to limited scope audits. These limited scope audits focus on a narrow set of audit objectives and specific audit populations.. 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 adjudication 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 established compliance metrics, along with additional direction provided by the MT to ensure the appropriate audit test work was conducted and relevant audit documentation was collected and analyzed.

Audit Population and Sampling

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

The auditors identified the investigations for the audit period in the Performance Recording and Monitoring System (PRMS)⁵, and reconciled the data with the Report Navigator⁶ to ensure the population selected was accurately accounted for.

The auditors evaluated completed⁷ investigations. This allowed for the evaluation of the effectiveness of the management review process. The population consisted of all 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 20 investigations available for initial evaluation. Subsequently, L-18 and L-19 were approved by NPD, resulting in a final audit population of 22 WCSCR 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.

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 for 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 Station	Palmdale Station	Lancaster Station	Palmdale Station
2025-3-A	15	16	7	9
2025-13-A	22	16	19	14

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

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

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

Audit Procedures

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

The auditors conducted detailed testing using audit tools designed for various audit objectives. The auditors analyzed the information gathered and documented their findings on audit work papers⁸ and 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. However, there are no established compliance metrics for sub-objective 1(e), "Corrective Action" and sub-objective 1(g), "Timeliness of Adjudication." As a result, nine of the 11 sub-objectives were measured against the established compliance metrics.

The AV Stations were evaluated separately for each sub-objective. The results were combined to assess whether they met the established compliance metrics. However, for sub-objective 1(j) – Recordation of Critical Information in PRMS and sub-objective 1(k) – Recordation of Non-Critical Information in the PRMS, the compliance rate was solely based on the Risk Management Bureau's Discovery Unit's compliance with the applicable criteria.

⁸ Audit work papers are formally known as audit working papers and are created, gathered and compiled by the auditor throughout the audit process. These documents provide the supporting documentation for the audit findings and conclusions.

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	ADJUDICATION OF PUBLIC COMPLAINTS				
1(a)	<i>Statement Discarded Due to Criminal History</i>	100%	100%	100%	85%
1(b)	<i>Deputy Statement Given Preference</i>	100%	100%	100%	85%
1(c)	<i>Address all Substantive Allegations</i>	94%	100%	97%	95%
1(d)	<i>Preponderance of Evidence</i>	88%	100%	94%	95%
1(e)	<i>Corrective Action</i>	100%	100%	100%	N/A ⁹
1(f)	<i>Unit Commander's Referral of WCSCR Investigations to Administrative Investigations</i>	100%	100%	100%	95%
1(g)	<i>Timeliness of Adjudication - 60 Day Requirement</i>	6%	36%	18%	N/A ⁹
	<i>Timeliness of Adjudication - 90 Day Requirement</i>	0%	14%	6%	
1(h)	<i>Recordation of Critical Information on the Results of Service Comment Review Form</i>	84%	93%	88%	95%
1(i)	<i>Recordation of Non-Critical Information on the Results of Service Comment Review Form</i>	100%	86%	94%	80%
1(j)	<i>Recordation of Critical WCSCR Investigation Information in the Performance Recording and Monitoring System (PRMS)</i>	100%	100%	100%	95%
1(k)	<i>Recordation of Non-Critical WCSCR Investigation Information in PRMS</i>	79%	100%	88%	80%

⁹ There is no applicable (N/A) compliance metrics for sub-objectives 1(e), Corrective Action and 1(g), Timeliness of Adjudication.

Detailed Findings

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

Objective No. 1 – Adjudication of Complaints

This objective evaluated the adjudication of WCSCR investigations.

Objective No. 1(a) – Statement Discarded Due to Criminal History

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (partial), 133, 134, 135, 136, and 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, this should not be limited to witness statements alone. The auditors determined whether any statements, including those from the complainant, were disregarded for any of the prohibited reasons.

Procedures

The auditors reviewed the complainant and civilian witness interviews, as well as the statements from the Department members who were involved or who witnessed the incident. Additionally, the auditors assessed all available corresponding documentation and BWC recordings. The auditors reviewed the adjudication to determine whether any witness statements were dismissed solely because the witness had a connection to the complainant or a prior criminal history. Furthermore, the auditors determined whether any statements, including those from the complainant, were disregarded for the prohibited reasons outlined in the Agreement, ensuring a thorough and impartial review of all evidence.

Findings

For the AV Stations combined, all 33 (100%) WCSCR investigations reviewed met the criteria for this objective because witness or complainant statements were not disregarded solely because the witness had a connection to the complainant or a prior criminal history.

For Lancaster Station, all 19 (100%) WCSCR investigations reviewed met the criteria for this objective because witness or complainant statements were not disregarded solely because the witness had a connection to the complainant or a prior criminal history.

For Palmdale Station, all 14 (100%) WCSCR investigations reviewed met the criteria for this objective because witness or complainant statements were not disregarded solely because the witness had a connection to the complainant or a prior criminal history.

Recommendations

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

Objective No. 1(b) – Deputy Statement Given Preference

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Investigation, Paragraphs 131 (partial), 133, 134, 135, 136 and 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 recorded interviews of complainants and civilian witnesses. In addition, the auditors reviewed the statements from the Department members who were involved in or who witnessed the incident, as well as all available corresponding documentation and BWC recordings. The auditors reviewed the adjudication to determine whether a Department member's statement was given automatic preference.

Findings

For the AV Stations combined, all 33 (100%) WCSCR investigations reviewed met the criteria for this objective because automatic preference was not given to a deputy's statement over a non-deputy's statement in the WCSCR investigations.

For Lancaster Station, all 19 (100%) WCSCR investigations reviewed met the criteria for this objective because automatic preference was not given to a deputy's statement over a non-deputy's statement in the WCSCR investigations.

For Palmdale Station, all 14 (100%) WCSCR investigations reviewed met the criteria for this objective because automatic preference was not given to a deputy's statement over a non-deputy's statement in the WCSCR investigations.

Recommendations

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

Objective No. 1(c) – Address all Substantive Allegations

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Management Oversight and Adjudication, Paragraph 130 states:

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

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

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

C. For at least 95% of public complaints, each significant allegation of misconduct is identified, ...

Procedures

The auditors reviewed the investigative packets and intake interviews (audio and/or video) for the WCSCR investigations, to identify the allegations made by the complainant.

In addition, the auditors reviewed BWC recordings that depicted the interaction between the Department members and complainants to ensure there were no additional allegations of misconduct that should have been identified.

Findings

For the AV Stations combined, 32 (97%) of the 33 WCSCR investigations reviewed met the criteria for this objective because each significant allegation of misconduct was identified.

For Lancaster Station, 18 (95%) of the 19 WCSCR investigations reviewed met the criteria for this objective because each significant allegation of misconduct was identified. The one remaining (5%) investigation did not meet the criteria because a significant allegation of misconduct was not identified.

For Palmdale Station, all 14 (100%) WCSCR investigations reviewed met the criteria for this objective because each significant allegation of misconduct was identified.

Specifically:

L-1¹⁰: The R/P alleged one of the reasons the Department members towed his vehicle was because of his race. However, the investigator did not address the additional allegation of Personnel Complaint – Discrimination.

Recommendations

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

¹⁰ L refers to Lancaster Station and the number corresponds to the selected sample within the audit population.

Objective No. 1(d) – Preponderance of Evidence

Criteria

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

3. *LASD will be deemed in substantial outcomes compliance when: ...*
 - C. *...each significant allegation of misconduct is identified, investigated and appropriately adjudicated, or the error is corrected during the management review.*
 - E. *For **at least 95%** of public complaints, each significant allegation is adjudicated using the preponderance of evidence standard.*

Procedures

The auditors verified each identified allegation [from Objective 1(c)] to ensure it was appropriately adjudicated or the error was corrected during management review. Additionally, the auditors used the preponderance of evidence standard by appropriately taking into account the weight of credible evidence, when, which viewed as a whole, more likely than not supports the determination standard.

Findings

For the AV Stations combined, 31 (94%) of the 33 WCSCR investigations reviewed met the criteria for this objective because each significant allegation was adjudicated using the preponderance of evidence standard, and the disciplinary action for all personnel who committed misconduct was acceptable.

For Lancaster Station, 17 (89%) of the 19 WCSCR investigations reviewed met the criteria for this objective because each significant allegation was adjudicated using the preponderance of evidence standard, and the disciplinary action for all personnel who committed misconduct was acceptable. The two remaining (11%) investigations did not meet the criteria because a significant allegation was not adjudicated using the preponderance of evidence standard.

For Palmdale Station, all 14 (100%) WCSCR investigations reviewed met the criteria for this objective because each significant allegation was adjudicated using the preponderance of evidence standard, and the disciplinary action for all personnel who committed misconduct was acceptable.

Specifically:

L-1: The R/P alleged, during the interview, one of the reasons the Department members towed his vehicle was because of his race. However, neither the investigator nor the captain addressed the additional allegation Personnel Complaint – Discrimination. The allegation of discrimination was not adjudicated for this investigation.

L-5: The R/P alleged the Department member was discourteous. The investigator assessed the incident and determined the Department member's actions appeared reasonable, and the captain concurred with the assessment. However, the Department member did not activate their BWC during the incident. Without a BWC recording, the disposition should have been classified as, "Unable to Make a Determination" (the review revealed insufficient information to assess the employee's alleged conduct or to identify the employees involved).

Recommendations

It is recommended Lancaster Station Unit Commanders conduct a thorough and objective review of WCSCR investigations, ensuring that findings are adjudicated based on the preponderance of the evidence standard. In cases when a Unit Commander fails to properly review and assess an investigation, Division Commanders should take prompt and documented corrective action to address the deficiency. This oversight mechanism is essential to maintaining the integrity of the investigative process while upholding the Department's commitment to accountability and the fair resolution of complaints.

Objective No. 1(e) – Corrective Action

Criteria

The auditors noted there are no established compliance metrics for sub-objective 2(d), "Corrective Action".

The proposed draft of the Service Comment Report (SCR) Handbook¹¹ (August 2022) states,

“Once the watch commander has completed the service review, he shall prepare a memo to the unit commander describing the complaint, the statements and evidence that support or refute the complaint, any corrective action taken, and the watch commander’s recommendation as to the disposition...”

Manual of Policy and Procedures MPP, Section 3-04/010.25, Personnel Complaints (October 2014) which states:

“The concerned Unit Commander is responsible for evaluating each personnel complaint to determine the appropriate supervisory response. The nature and seriousness of the allegation(s), the potential for employee discipline, and the concerned employee’s performance history are potential factors to consider in the evaluation.”

Administrative Investigations Handbook (Revised October 2005), which states:

“The booklet Guidelines for Discipline and Education-Based Alternatives (revised August 2020) assists managers in deciding when and how to impose discipline. This booklet is to be used by Department managers and executives as a resource document when determining discipline.”

In accordance with Department Policy, the auditors evaluated any corrective action taken, considering the severity of the offense, the impact on the Department and community, and the employee’s work history.

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

¹¹ Proposed draft SCR Handbook, revised 08/01/2022.

Procedures

The auditors reviewed completed WCSCR investigations adjudicated by NPD to determine whether investigations dispositioned as “Appears employee conduct should have been different” or “Appears employee conduct could have been better” resulted in corrective action. The auditors examined whether corrective action was taken, given the severity of the offense, the employee’s prior history, and the Department’s established discipline guideline. Corrective action reviewed included counseling, training, and written reprimands, when applicable. To verify whether corrective action occurred, the auditors reviewed station APIS rosters, the Learning Management System¹² portal, as well as contacted the AV Stations’ training coordinator when necessary. If the auditors determined corrective action should have been taken but was not, this would result in an audit finding.

Findings

Of the 33 WCSCR investigations, 17 were found with documented corrective action. All 17 (100%) met the criteria for this objective because the auditors determined the corrective action was within a reasonable range of management discretion, given the severity of the offense, employee history, and the Department’s established discipline guidelines.

Recommendations

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

¹² The Learning Management System is a countywide learning and training system that provides online classes to employees of Los Angeles County and retains training records for personnel who completed the required courses.

Objective No. 1(f) – Unit Commander’s Referral of WCSCR Investigations to Administrative Investigations

Criteria

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

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

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

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

The auditors will use the factors outlined in the Manual of Policy and Procedures (MPP), Section 3-04/010.25, Personnel Complaints (October 2014), which states:

The concerned Unit Commander is responsible for evaluating each personnel complaint to determine the appropriate supervisory response. The nature and seriousness of the allegation(s), the potential for employee discipline, and the concerned employee’s performance history are potential factors to consider in the evaluation.

Additionally, the auditors used the factors outlined in the Administrative Investigations Handbook (Revised October 2005), which states:

Administrative Investigations

While most investigations will be conducted at the unit level, there may be situations that require assignment to the Internal Affairs Bureau.

Criminal Investigations

If the allegations involved are criminal in nature, the unit commander shall notify the division chief, who may request a criminal investigation. If the incident will be investigated criminally, there should be no discussion regarding the incident with the subject.

Lastly, the auditors used the proposed draft of the Service Comment Report Handbook (August 2022), which states:

If the unit commander determines that the complaint, if found true, may result in formal discipline, then the unit commander may initiate an administrative investigation. Should the unit commander decide to elevate the inquiry, the division chief must determine whether the administrative investigation would be handled at the unit level or by Internal Affairs Bureau (IAB), refer to MPP 03-04/020.05 Initiation of Administrative Investigations.

Procedures

The Unit Commander is responsible for determining whether a public complaint should remain a WCSCR investigation, which excludes the imposition of discipline, or whether it should be classified as an administrative or criminal investigation, both of which may result in disciplinary measures.

In accordance with the Administrative Investigations Handbook, SCR Handbook, and MPP policy, the auditors determined whether alleged incidents of misconduct associated with public complaints were appropriately directed to the IAB or ICIB for further investigation.

Per discussions with the MT, compliance was based on whether the investigations AAB determined should have been referred to IAB or ICIB were appropriately routed.

Findings

For the AV Stations combined, all (100%) met the criteria for this objective because the Unit Commander correctly determined whether a public complaint should remain a WCSCR investigation, which would exclude the imposition of discipline, or whether it should be classified as an administrative or criminal investigation, both of which may result in disciplinary measures. None of the evaluated WCSCRs during this audit time period required further investigation with IAB or ICIB.

For Lancaster Station, all (100%) WCSCR investigations reviewed met the criteria for this objective because the Unit Commander correctly determined whether a public complaint should remain a WCSCR investigation, which would exclude the imposition of discipline, or whether it should be classified as an administrative or criminal investigation, both of which may result in disciplinary measures.

For Palmdale Station, all (100%) WCSCR investigations reviewed met the criteria for this objective because the Unit Commander correctly determined whether a public complaint should remain a WCSCR investigation, which would exclude the imposition of discipline, or whether it should be classified as an administrative or criminal investigation, both of which may result in disciplinary measures.

Recommendations

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

Objective No. 1(g) – Timeliness of Adjudication

Criteria

There is no specific compliance metric for sub-objective 1(g), “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 the NPD and a 90-day timeline to the Discovery Unit. Per discussions with the MT, the auditors agreed to utilize the proposed timeliness in the draft SCR Handbook as the standard for evaluating the timeliness of WCSCR investigations for this audit.

Procedures

To determine whether each of the WCSCR investigations reviewed was submitted to the 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 Service Comment Review 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 Service Comment Review form.

To meet the criteria for this sub-objective, the WCSCR investigations must be submitted to NPD within the 60-day requirement, and to the Discovery Unit within the 90-day requirement.

Findings

For the AV Stations combined, six (18%) of the 33 WCSCR investigations reviewed met the criteria for this objective because the WCSCR investigation was submitted to the NPD within the proposed 60-day timeline requirement. In addition, two (6%) of the WCSCR investigations were submitted to the Discovery Unit within the 90-day timeline requirement.

For Lancaster Station, one (6%) of the 19 WCSCR investigations met the criteria for this objective because the investigation was submitted within the proposed timeline requirement.

Additionally, none (0%) of the 19 WCSCR investigations were submitted to the Discovery Unit within the 90-day timeline requirement

For Palmdale Station, five (36%) of the 14 WCSCR investigations reviewed met the criteria for this objective because they were submitted to the NPD within the proposed 60-day timeline requirement.

Additionally, two (14%) of the 14 WCSCR investigations were submitted to the Discovery Unit within the 90-day timeline requirement.

Specifically:

Sample No.	No. of Days WCSCR Investigations Exceeded the 60-Day Requirement	No. of Days WCSCR Investigations Exceeded the 90-Day Requirement
L-1	193	173
L-2	61	68
L-3	66	64
L-4	126	117
L-5	157	164
L-6	28	61
L-7	153	138
L-8	73	64
L-9	Met the 60-day timeline requirement	142
L-10	36	37
L-11	185	168
L-12	241	236
L-13	175	154
L-14	196	177
L-15	67	48
L-16	31	26
L-17	122	129
L-18	193	174
L-19	206	189
P-1 ¹³	14	8
P-2	12	Met the 90-day timeline requirement
P-3	Met the 60-day timeline requirement	Met the 90-day timeline requirement
P-4	23	82
P-5	30	75
P-6	Met the 60-day timeline requirement	41
P-7	Met the 60-day timeline requirement	25
P-8	58	75
P-9	54	70
P-10	22	16
P-11	13	167
P-12	Met the 60-day timeline requirement	58
P-13	Met the 60-day timeline requirement	5
P-14	4	49

¹³ P refers to Palmdale Station and the number corresponds to the selected sample within the audit population.

During the review, the auditors also noted:

- The investigators for Lancaster Station took a median of 86 days, and for Palmdale Station, 28 days to submit their report.
- Operations for Lancaster Station took a median of 4 days, and for Palmdale Station, 12 days to complete their review.
- The NPD took a median of 3 days to complete reviews for Lancaster Station and 52 days for Palmdale Station.

Recommendations

It is recommended the Department implement a revised timeline in the proposed draft SCR Handbook. Currently, in the proposed draft SCR Handbook, there is a 90-day timeline. However, this timeline should be extended to allow for more thorough and complete investigations before submission to the Unit Commander and 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 that an internal tracker be developed to monitor the completion status of the WCSCR investigation at each level of review.

Objective No. 1(h) – Recordation of Critical Information on the Result of Service Comment Review 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 form should be compared to the corresponding information in the WCSCR investigation packet, BWC recordings, and audio recordings, 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 all documentation within the completed packets for each investigation, including incident reports, supplemental reports, and booking packets to verify all critical information was accurately documented. The auditors reviewed information related to all accused employees, allegations of significant misconduct, disposition of each allegation, and any recommended or implemented corrective actions. In addition, if any discrepancies were found among the critical data recorded, the auditors identified which data was accurate.

Findings

For the AV Stations combined, 30 (91%) of the 33 WCSCR investigations reviewed met the criteria for this objective because critical information was accurately recorded on the Result of Service Comment Review form.

For Lancaster Station, 16 (84%) of the 19 WCSCR investigations reviewed met the criteria for this objective because all critical information was accurately recorded on the Result of Service Comment Review form. The three remaining (16%) investigations reviewed did not meet the criteria for this objective because all critical information was not accurately recorded on the Result of Service Comment Review form.

For Palmdale Station, all (100%) of the WCSCR investigations reviewed met the criteria for this objective because all critical information was accurately recorded on the Result of Service Comment Review form.

Specifically:

L-1: The review disposition was based only on the allegation of improper detention, search, or arrest and did not include the allegation of discrimination. Therefore, the information was not accurately recorded.

L-5: The “Review Disposition” section of the Result of Service Comment Review form should have been documented as “Unable to Make a Determination”, as the investigation revealed the deputies failed to activate their BWC leaving insufficient information to assess the employee’s alleged misconduct.

L-16: The “Review Disposition” section of the Result of Service Comment Review form should have been documented as “Employee Conduct Should Have Been Different”, as the investigation revealed a Service Complaint together with a Personnel Complaint could not be disposition as a “Review Comp-Service Only-No Further Action.” Changes were made on the memo to reflect the new Disposition but was erroneously marked as “Employee Conduct Appears Reasonable” on the Result of Service Comment Review for All Patrol.

Recommendations

It is recommended the Result of Service Comment Review form includes a section indicating the individuals responsible for completing the form through each stage of the approval process. NPD Commanders must take timely and documented corrective action when discrepancies or inaccuracies are identified and not adequately addressed.

Objective No. 1(i) – Recordation of Non-Critical Information on the Result of Service Comment Review 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:

g) 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 from the Result of Service Comment Review forms and compared this information to the corresponding information, BWC recordings, and audio recordings. This comparison ensured all non-critical information was accurately recorded on the Result of Service Comment Review form. In addition, if any discrepancies were found among the non-critical data recorded, the auditors determined which data was accurate.

Findings

For the AV Stations combined, 29 (88%) of the 33 WCSCR investigations reviewed met the criteria for this objective because non-critical information was accurately recorded on the Result of Service Comment Review form.

For Lancaster Station, all 17 (89%) WCSCR investigations reviewed met the criteria for this objective because all non-critical information was accurately recorded on the Result of Service Comment Review form. The two remaining (11%) investigations did not meet the criteria because non-critical information related to the investigation was not accurately recorded or was missing from the Result of Service Comment Review form.

For Palmdale Station, 12 (86%) of the 14 WCSCR investigations reviewed met the criteria for this objective because all non-critical information was accurately recorded on the Result of Service Comment Review form. The two remaining (14%) investigations did not meet the criteria because non-critical information related to the investigation was not accurately recorded or was missing from the Result of Service Comment Review form.

Specifically:

L-15: The WCSCR “Received by Unit Date” on the Result of Service Comment Review form was October 15, 2024. However, the accurate date on the email received by SIB was October 11, 2024.

P-17: The “Review Completed Date” on the Result of Service Comment Review form was March 15, 2025. However, the date on the investigation was April 4, 2025.

P-12: The final outcome letter date on the Result of Service Comment Review form was November 15, 2024. However, the accurate date on the letter and on PRMS was November 20, 2024.

P-13: The final outcome letter date on the Result of Service Comment Review form and on PRMS was October 9, 2024. However, the accurate date on the letter was October 3, 2024.

Recommendations

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

Objective No. 1(j) – Recordation of Critical WCSCR Investigation Information in PRMS

Criteria

Agreement Paragraph 142 states:

LASD-AV will ensure that PPI¹⁴ 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 objective is 95%.

Procedures

The auditors reviewed the Service Comment module of PRMS to determine whether all critical information from the Result of Service Comment Review form for each reviewed investigation was accurately recorded in PRMS. Specifically, the auditors reviewed the critical information in the Result of Service Comment Review forms to ensure they aligned with the information documented in PRMS.

Findings

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

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

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

Recommendations

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

¹⁴ PRMS is formerly known as the Personal Performance Index (PPI).

Objective No. 1(k) – Recordation of Non-Critical Information in 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 metric for this sub-objective is 80%.

Procedures

The auditors reviewed the Service Comment module of PRMS to determine whether all non-critical information from the Result of Service Comment Review form was accurately recorded. Specifically, the auditors reviewed the non-critical information in the Result of Service Comment Reviews forms to ensure it aligned with the information documented in PRMS.

Findings

For the AV Stations combined, 29 (88%) of the 33 WCSCR investigations reviewed met the criteria for this objective because the recordation of non-critical information in PRMS was recorded accurately.

For Lancaster Station, 15 (79%) of the 19 WCSCR investigations reviewed met the criteria for this objective because the recordation of non-critical information in PRMS was recorded accurately. The four remaining (21%) WCSCR investigations reviewed did not meet the criteria.

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

Specifically:

L-5: The outcome letter sent date in PRMS shows February 28, 2025. The auditors found Lancaster Station submitted a modification log reflecting an updated sent date of May 6, 2025. Upon further review it was discovered PRMS had not been updated to reflect the correct date.

L-6: The outcome letter sent date on the document was December 19, 2024. However, in PRMS, the date is December 19, 1954.

L-15: The report date on the WCSCR shows October 15, 2024. However, in PRMS the date is October 16, 2024.

L-16: The Unit Commander Date on the “Result of Service Comment Review” is July 15, 2025. However, in PRMS the date is July 5, 2025.

Recommendations

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

CONCLUSION

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

The AAB will continue to conduct audits to uphold transparency and accountability, assess progress, and provide recommendations for ongoing improvement at the AV Stations. These efforts are essential in assisting the AV Stations in achieving 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 AV Settlement Agreement and Department policies and procedures. The recommendations listed below are the same as those detailed in the above report.

Objective No. 1 – Adjudication of Public Complaints

- d) **Preponderance of Evidence:** It is recommended Unit Commanders conduct a thorough and objective review of WCSCR investigations, ensuring that findings are adjudicated based on the preponderance of the evidence standard. In cases where a Unit Commander fails to properly review and assess an investigation, Division Commanders should take prompt and documented corrective action to address the deficiency. This oversight mechanism is essential to maintaining the integrity of the investigative process while upholding the Department's commitment to accountability and the fair resolution of complaints.

On December 5, 2024, the Unit Commander from Palmdale Station issued a Service Comment Report Expectations memorandum to all Sergeants and Lieutenants stating, "each significant allegation of misconduct shall be identified, investigated, and appropriately adjudicated, or the error corrected during management review." The AAB will continue to monitor the progress of the corrective action provided by the Station.

- g) **Timeliness of Adjudication:** It is recommended the Department implement a revised timeline in the proposed draft SCR Handbook. Currently, in the proposed draft SCR Handbook, there is a 90-day timeline. However, this timeline should be extended to allow for more thorough and complete investigations before submission to the Unit Commander and to NPD.

Additionally, 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.

- h) **Recordation of Critical Information on the Results of Service Review Form:** It is recommended the Result of Service Comment Review form includes a section indicating the individuals responsible for completing the form through each stage of the approval process. NPD Commanders must take timely and documented corrective action when discrepancies or inaccuracies are identified and not adequately addressed.

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
- Station/Bureau Administration Portal (SBAP)¹⁵ Risk Management Tracker
- NICE Inform
- Scheduling Management System (SMS)
- LASD.Evidence.com
- Learning Management System

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 Report Handbook (August 2022)
- Administrative Investigations Handbook (October 2005)

¹⁵ The SBAP is a data entry system designed to collect and track data related to risk management incidents, which are primarily used at a station level. The system includes data on uses of force, traffic collisions, public comments, pursuits, administrative investigations, shots fired, employee injuries, and lawsuits and civil claims.

Views of Responsible Officials

On October 1, 2025, Palmdale Station command staff submitted a response to the AAB concurring with the corresponding audit findings. On October 9, 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.



GEOFFREY N. CHADWICK
Captain

12/08/25

DATE

Audit and Accountability Bureau
Los Angeles County Sheriff's Department