



# Office of Inspector General County of Los Angeles

## **Report Card on Sheriff's Department's Reforms 2019 to 2023**

**Issued February 20, 2024**

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## **INTRODUCTION**

During his campaign for office, Sheriff Luna noted the significant number of recommendations by the Office of Inspector General that the prior Sheriff never implemented. At the close of Sheriff Luna's first year in office, we summarize the Sheriff's Department's progress implementing not only recommendations made to his administration but also outstanding recommendations made to the previous administration. A change in administration does not absolve the Department of responsibility to consider recommendations previously made by the Office of Inspector General or other oversight entities.

This report is divided into four sections. The first sets forth the status of the implementation of recommendations made in Office of Inspector General reports during the prior Sheriff's administration. Some recommendations were not originally included in the report card issued in 2022. Because these changes were not highlighted when Sheriff Luna began his term, we note that these recommendations were added for this report card. The second section sets forth the status of the implementation of recommendations made in Office of Inspector General reports issued under this administration in the calendar year 2023. The third section presents the status of the implementation of PREA recommendations based on audits of four station jails. The fourth and final section summarizes the status of the final adoption of Sheriff's Department policies that the Department provided to Office of Inspector General staff for review and input.

The Inspector General recognizes that the Sheriff's Department may not be able to implement all recommendations quickly. While the Department may not have had time to implement recommendations made in the second half of the past year, those recommendations are nevertheless included for tracking purposes.

We look forward to continuing collaboration with the Sheriff's Department on implementing reforms consistent with principles of 21<sup>st</sup> century policing.

## **OFFICE OF INSPECTOR GENERAL REPORTS 2019 - 2022**

From 2019 to 2022, the Office of Inspector General made a total of 136 recommendations in its public reporting. Of those, the Sheriff's Department implemented 31, less than 25%. By comparison, the report card issued in October of 2022 covered 111 total recommendations, of which the previous administration

implemented only 7 of and this administration implemented 19 more.<sup>1</sup> While the Sheriff's Department can address the concerns raised by oversight without adopting each and every oversight recommendation exactly as made, the Department has currently implemented so few recommendations that it cannot be considered meaningfully responsive to oversight concerns and proposed reforms.

The following is a chart of the overall status of the implementation of the recommendations followed by a chart of the recommendations by calendar year.

| <b>Recommendation Status</b> |                    |                        |
|------------------------------|--------------------|------------------------|
| <b>Year</b>                  | <b>Implemented</b> | <b>Not Implemented</b> |
| <b>2019</b>                  | <b>15</b>          | <b>25</b>              |
| <b>2020</b>                  | <b>2</b>           | <b>13</b>              |
| <b>2021</b>                  | <b>10</b>          | <b>43</b>              |
| <b>2022</b>                  | <b>4</b>           | <b>24</b>              |
| <b>Total</b>                 | <b>31</b>          | <b>105</b>             |

## 2019 Reports<sup>2</sup>

| <b>2019 Recommendations</b> |              |
|-----------------------------|--------------|
| <b>Status</b>               | <b>Total</b> |
| <b>Implemented</b>          | <b>15</b>    |
| <b>Not Implemented</b>      | <b>25</b>    |

<sup>1</sup> This report card includes one additional report for the year 2021 and three additional reports for the year 2022 that the October 2022 report card did not include.

<sup>2</sup> For reports from the year 2019, this administration notes the adoption of six additional recommendations: three relating to Sheriff's Department hate crimes policies and three relating to the Inmate Reception Center.

**REFORM AND OVERSIGHT EFFORTS: LOS ANGELES COUNTY  
SHERIFF'S DEPARTMENT – JANUARY TO MARCH 2019  
Published March 2019**

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p><b>1</b> The Sheriff's Department should attach narrative descriptions on the Sheriff's Department's website for all Deputy-Involved Shootings.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented</p> | <p>The Sheriff's Department's website, LASD.org, provides very brief descriptions, or no descriptions, of deputy involved shootings.</p> |

**PROTECTING VULNERABLE COMMUNITIES: A REVIEW OF THE LOS ANGELES COUNTY SHERIFF'S DEPARTMENT'S HATE CRIME POLICIES, PROCEDURES, AND TRAINING  
Published April 2019**

| RECOMMENDATION   | ORIGINAL ISSUE  |
|--|---|
| <p><b>1</b> Update the Sheriff's Department hate crime and hate incident review and tracking systems to ensure hate crimes and hate incidents are accurately identified and not underreported to the California DOJ and other agencies.</p> <p><b>Recommendation Implemented:</b><br/>Partially implemented<br/>2023 Update:<br/>Proposed revisions to policies covering the handling of hate crimes/hate incidents were presented to the Office of Inspector General in June 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> | <p>The Sheriff's Department's tracking system did not accurately identify, and report hate crimes and hate incidents.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE   |
|--|--|
| <p>The Sheriff’s Department reports that two Hate Crimes Coordinators review all reports of hate crimes and hate incidents to ensure accuracy in report writing, categorization, and entry into the LASD uniform reporting database. The proposed hate crimes/hate incidents policy requires an annual audit of data to ensure hate crimes/hate incidents are accurately reported and align with information reported to the CA DOJ.</p>   |  |
| <p><b>2</b> Provide refresher hate crimes trainings and mandate an implicit bias reduction training curriculum conducted by a subject matter expert in the area.</p> <p><b>Recommendation Implemented:</b><br/>Partially Implemented<br/>2023 Update:<br/>The proposed revisions to policies covering the handling of hate crimes do not cover this recommendation specifically. However, the Sheriff’s Department reports that hate crimes training is currently conducted by a Hate Crimes Coordinator and that the Hate Crimes Coordinators are developing a county-wide training program for training to be presented by the Hate Crime Task Force at each unit of assignment.</p> | <p>The Sheriff’s Department personnel conducting hate crime trainings were not subject matter experts.</p>   |
| <p><b>3</b> Require patrol deputies to use a checklist during hate crime investigations to help develop expertise in identifying and investigating such crimes.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:</p>   | <p>Sheriff’s Department policies and procedures did not require the use of a checklist, which is recommended by the Commission on Peace Officer Standards and Training (POST), when taking reports of hate crimes.</p> |

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p>Proposed revisions to policies covering the handling of hate crimes were presented to the Office of Inspector General in June 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> <p>The Sheriff's Department reports that the Hate Crimes Task Force developed a Hate Crime Handling Checklist for deputies use to recognize and handle hate crimes/hate incidents. This checklist is provided to patrol station personnel and trainees prior to the start of their field training program and is accessible to personnel at all patrol stations. The draft policies for handling hate crimes requires use of the checklist. In order for this recommendation to be fully implemented, the Sheriff's Department must adopt a policy requiring its use.</p> |  |
| <p><b>4</b> Require personnel to familiarize themselves with the California Attorney General's Hate Crime Rapid Response Team protocols to ensure awareness of all resources available to them when handling qualifying hate crimes.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering the handling of hate crimes were presented to the Office of Inspector General in June 2023 but have not been adopted; the Office of</p>   | <p>The Sheriff's Department has no mechanism in place to ensure deputies familiarize themselves with the Attorney General's protocols.</p> |



| RECOMMENDATION   | ORIGINAL ISSUE  |
|--|---|
| <p>Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> <p>The Sheriff's Department reports that efforts to obtain CA DOJ Hate Crimes Rapid Response Team protocols were unsuccessful but that LASD Hate Crimes Task Force personnel are available for significant hate crimes/incidents events that would prompt deployment of CA DOJ Hate Crime Rapid Response Team.</p>   |   |
| <p><b>5</b> Implement community outreach programs related specifically to hate crimes and hate incidents.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>2023 Update:<br/>Proposed revisions to policies covering the handling of hate crimes were presented to the Office of Inspector General in June 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> <p>The LASD Hate Crime Task Force hosted a Hate Crimes Summit in September 2023 and included members of community groups and all station-level Hate Crime Coordinators.</p> | <p>The Sheriff's Department should have community outreach programs in each community they serve.</p> |
| <p><b>6</b> Require cultural-sensitivity trainings to help build cultural competency.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:</p>   | <p>The Sheriff's Department was not consistently providing cultural-sensitivity trainings.</p>        |



| RECOMMENDATION   | ORIGINAL ISSUE  |
|--|---|
| <p>Proposed revisions to policies covering the handling of hate crimes were presented to the Office of Inspector General in June 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> <p>The Sheriff's Department reports that it provides cultural sensitivity training in academy classes, patrol schools, and supervisor courses. Cultural sensitivity training materials were not provided to OIG. The Sheriff's Department reports that it is developing and implementing training modules on cultural sensitivity. Implicit bias training and training on use of proper pronouns were provide to the patrol station Hate Crimes Coordinators. However, in recent meetings with Custody staff, personnel, including PREA employees, did not use the appropriate pronouns when discussing housing for people in custody.</p> |   |
| <p><b>7</b> Develop stronger relationships with community leaders to better assess the unique needs and fears of vulnerable communities when reporting hate motivated events.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>2023 update:<br/>The Sheriff's Department reports that Sheriff Luna organized an LGBTQ+ advisory group to assist with LGBTQ+ issues throughout the Sheriff's Department. The Department also reports that DOJ-CRS provided</p>  | <p>The Sheriff's Department has failed to develop strong relationships with the leaders in each of the communities policed to address hate motivated crimes and incidents</p> |

| RECOMMENDATION   | ORIGINAL ISSUE   |
|--|--|
| <p>LGBTQ+ training to some LASD personnel.</p>   |  |
| <p><b>8</b> Ensure compliance with California Penal Code section 422.92 by routinely updating the Sheriff's Department's hate crimes brochure and distributing it to victims of hate crimes and to the public.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>2023 update:<br/>The Sheriff's Department reports that its current brochure was revised in August 2023, provided to all patrol stations, and is accessible to the public online.</p> | <p>The Sheriff's Department was not routinely updating its hate crimes brochure</p>  |
| <p><b>9</b> Follow the requirements set forth in AB 1985.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering the handling of hate crimes were presented to the Office of Inspector General in June 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p>              | <p>The Sheriff's Department's policies and procedures were not up to date with the requirements of AB 1985, which became effective on January 1, 2019.</p> |

**LOS ANGELES COUNTY SHERIFF'S DEPARTMENT'S SANTA CLARITA  
VALLEY DOMESTIC HIGHWAY ENFORCEMENT TEAM**

**Published April 2019**

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p><b>1</b> Before any deputy is assigned to the DHET team, he, or she, at minimum, receive training on Drug Trafficker Interdiction, Drug Trafficking Investigations, and Drug Identification Packaging, along with any other specialized highway drug-interdiction training.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>2023 update:<br/>As reported by the Sheriff's Department Narcotics Bureau, the DHET team was disbanded in November 2018. While the Narcotics Bureau proposed the reformation and deployment of the DHET team in August 2019, which was approved by Detective Division, the DHET team was never recreated or deployed. By letter dated January 10, 2024, the Sheriff's Department affirmed that the "order approving the re-deployment of DHET was countermanded and the team will not be deployed at this time," and that "if the team is ever re-instituted," the Sheriff's Department will advise OIG beforehand.</p> | <p>The investigation into the DHET team revealed that some of the deputies involved seemed to lack comprehensive knowledge on recognized standards of drug trafficking investigations including but not limited to constitutionally proper stops, searches, and arrests.</p> |
| <p><b>2</b> Before any supervisor is assigned to supervise the DHET, he or she receive training on Narcotic and Specialized Unit Supervision.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>2023 update:</p>   | <p>The investigation into the DHET team revealed a lack of cohesive supervision and knowledge of how each DHET team member was conducting investigations and whether there were issues of racial bias that went unchecked.</p>   |

| RECOMMENDATION  | ORIGINAL ISSUE  |
|---|---|
| <p>As reported by the Sheriff's Department Narcotics Bureau, the DHET team was disbanded in November 2018. While the Narcotics Bureau proposed the reformation and deployment of the DHET team in August 2019, which was approved by Detective Division, the DHET team was never recreated or deployed. By letter dated January 10, 2024, the Sheriff's Department affirmed that the "order approving the re-deployment of DHET was countermanded and the team will not be deployed at this time," and that "if the team is ever re-instituted," the Sheriff's Department will advise OIG beforehand.</p>   |   |
| <p><b>3</b> All DHET supervisors and deputies attend annual training on search-and-seizure law updates and on expert testimony.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>2023 update:<br/>As reported by the Sheriff's Department Narcotics Bureau, the DHET team was disbanded in November 2018. While the Narcotics Bureau proposed the reformation and deployment of the DHET team in August 2019, which was approved by Detective Division, the DHET team was never recreated or deployed. By letter dated January 10, 2024, the Sheriff's Department affirmed that the "order approving the re-deployment of DHET was countermanded and the team will not be deployed at this time," and that "if the team is ever re-instituted," the Sheriff's</p> | <p>The traffic stops analyzed by the Office of Inspector General revealed some alarming disproportionate statistics as to race and constitutional searches.</p> |

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p>Department will advise OIG beforehand.</p>   |  |
| <p><b>4</b> All DHET supervisors and deputies attend biannual training on racial profiling and cultural diversity.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>2023 update:<br/>As reported by the Sheriff’s Department Narcotics Bureau, the DHET team was disbanded in November 2018. While the Narcotics Bureau proposed the reformation and deployment of the DHET team in August 2019, which was approved by Detective Division, the DHET team was never recreated or deployed. By letter dated January 10, 2024, the Sheriff’s Department affirmed that the “order approving the re-deployment of DHET was countermanded and the team will not be deployed at this time,” and that “if the team is ever re-instituted,” the Sheriff’s Department will advise OIG beforehand.</p> | <p>The traffic stops analyzed by the Office of Inspector General resulted in some alarming disproportionate statistics as to race and constitutional searches.</p>           |
| <p><b>5</b> A written policy or unit order be implemented for the DHET and/or any other specialized station unit that sets forth the goals and expectations of the team, as well as specific guidance on how to develop legally-sound probable cause for pretextual traffic stops and any resulting detentions.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>2023 update:<br/>As reported by the Sheriff’s Department Narcotics Bureau, the DHET team was disbanded in</p>  | <p>Written policies or unit orders were never developed or implemented to provide the DHET members with guidance on how traffic stops should be conducted or documented.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE   |
|--|--|
| <p>November 2018. While the Narcotics Bureau proposed the reformation and deployment of the DHET team in August 2019, which was approved by Detective Division, the DHET team was never recreated or deployed. By letter dated January 10, 2024, the Sheriff's Department affirmed that the "order approving the re-deployment of DHET was countermanded and the team will not be deployed at this time," and that "if the team is ever re-instituted," the Sheriff's Department will advise OIG beforehand.</p> |  |
| <p><b>6</b> The Sheriff's Department should have a stand-alone policy that clearly prohibits racial profiling.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented</p>  | <p>An analysis conducted and published by the Los Angeles Times of stops conducted by the DHET team concluded that two-thirds of the DHET team's stops were of Latino drivers, fueling the perception that these deputies were racially profiling.</p>   |
| <p><b>7</b> The Sheriff's Department should ensure all unit orders are properly vetted in accordance with Manual of Policy and Procedures (MPP) Section 3-09/340.00, Department Information.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff's Department reports that FOSS is drafting an order that all unit orders go through FOSS to ensure consistency.</p>  | <p>On August 22, 2018, Santa Clarita Valley Station management implemented Unit Order No. 30.20-18, Watch Guard In-Car Video System. This unit order was rescinded September 18, 2018. MPP 3-09/340.00, Department Information, requires all unit orders be vetted through a series of units, including Risk Management Bureau and Field Operations Support Services, to ensure they are consistent with department-wide policies. There is no indication that the unit order implemented in August and rescinded in</p> |

| RECOMMENDATION   | ORIGINAL ISSUE  |
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|  | September was vetted as required.   |
| <p><b>8</b> The Sheriff’s Department should ensure adherence to California Government Code section 25355 and County Fiscal Manual Section 2.4.2, Donation Reporting Requirements, when receiving donations.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering donations to the Sheriff’s Department and fundraising activities by the Sheriff’s Department and Sheriff’s Department groups were presented to the Office of Inspector General in November 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff’s Department.</p> | <p>The Department’s receipt of video systems from LA CLEAR in 2012 and the City of Santa Clarita in 2015 did not appear to have been authorized by the Board of Supervisors. California Government Code section 25355 permits the County to accept grants, donations, or gifts for a specific purpose, but County Fiscal Manual Section 2.4.2, Donation Requirements, requires that any donation that exceeds \$10,000 be placed on the agenda for the Board’s consideration and acceptance. Additionally, the Board requires each department to file a quarterly report with the Executive Officer-Clerk of the Board of Supervisors listing all gifts received, regardless of the amount. Neither the Department’s liaison to the Board of Supervisors nor the Department’s Administrative Services Division, Financial Programs Bureau manager were able to locate any documentation related to the video systems provided by LA CLEAR or the City of Santa Clarita. The Department’s liaison to the Board of Supervisors confirmed the in-car video systems from the City of Santa Clarita were not processed through the Board of Supervisors.</p> |



| RECOMMENDATION   | ORIGINAL ISSUE   |
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| <p><b>9</b> Station management should work with the Sheriff’s Department's Administrative Services Division to ensure that the in-car video system purchased by the City of Santa Clarita in 2015 for DHET's use is properly accounted for.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering donations to the Sheriff’s Department and fundraising activities by the Sheriff’s Department and Sheriff’s Department groups were presented to the Office of Inspector General in November 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff’s Department.</p> | <p>Office of Inspector General staff confirmed that four in-car video systems totaling \$27,534 were purchased by the City of Santa Clarita and installed in four patrol vehicles assigned to the DHET in July 2015. However, the Department’s Administrative Services Division was unable to locate any documentation related to these video systems.</p> |

**RESPONSE TO CIVILIAN OVERSIGHT COMMISSION AD HOC  
COMMITTEE INQUIRY ON EXCESSIVE FORCE  
Published June 2019**

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p><b>1</b> The Sheriff’s Department should document in detail cases in which a complaint is terminated because the complainant is suspected of having mental instability.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering Watch Commander Service Report (the protocol for filing and</p> | <p>The complaint process allows a complaint to be terminated if the handling supervisor deems the complainant to be under the influence or mentally unstable. Given that the mentally ill are a marginalized part of society, special care must be taken to evaluate these cases carefully and respectfully.</p> |

| RECOMMENDATION  | ORIGINAL ISSUE |
|---|----------------|
| <p>tracking complaints to the Sheriff's Department) and a handbook for Watch Commander Service Comment Reports (WCSCR) were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> <p>The Sheriff's Department reports that the revised handbook and policy revisions emphasize the importance of accepting all complaints and logging and handling them thoroughly. The Department also reports that the handbook and policy more clearly define "unfounded" complaints.</p> <p>The OIG confirmed that the handbook and the proposed MPP revision address the importance of accepting and documenting public complaints and that the Department will accept and review any comment from any member of the public. There are references to the necessity of thorough investigations throughout the handbook and in the proposed revisions to the MPP.</p> <p>Both the handbook and the proposed revisions to the MPP for refusing to accept a compliant, discouraging the filing of a complaint or providing false or misleading information about a filing a complaint, include a specific reference to discipline that lists termination as possible discipline. The handbook provides examples of unfounded complaints. The Sheriff's</p> |                |

| RECOMMENDATION   | ORIGINAL ISSUE  |
|--|---|
| <p>Department must ensure that any revised policy deletes any reference to preponderance of the evidence standard as it relates to finding of exonerated or unfounded and that the policy require “clearly established” as the standard for these findings as required by California Penal Code section 832.5(d).</p>  |   |
| <p><b>2</b> The allegations-of-force cases should be properly tracked and reported in a consistent manner. The Sheriff’s Department should develop a department-wide policy to accomplish this. These cases should be tracked and reported in a centralized computer database accessible to unit commanders and not simply on a tracker at the Discovery Unit.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering Watch Commander Service Report (the protocol for filing and tracking complaints to the Sheriff’s Department) and a handbook for Watch Commander Service Comment Reports (WCSCR) were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff’s Department.</p> <p>The Sheriff’s Department reports it is seeking to implement department-wide technology systems to document and track use-of-force allegations.</p> | <p>An Office of Inspector General inquiry revealed inconsistencies on how the Sheriff’s Department tracks complaints in allegations-of-force cases. In some stations, accounting for allegation-of-force cases is straightforward – they are handled in the same manner as a public complaint of excessive force and documented in PRMS. In some stations, they are handled as an allegation-of-force inquiry, which is documented in a memorandum and forwarded to the Discovery Unit for tracking if it is determined that there is no validity to the allegation. And in other stations, they are subjected to various scenario-based questions to determine whether they will be investigated as a public complaint, a force case, or a criminal or administrative investigation and tracked in PRMS.</p> |

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p><b>3</b> The Sheriff’s Department should reassess its definitions of unfounded and exonerated within the Manual of Policy and Procedures and adjust them to mirror the definition of those terms in Penal Code sections 832.5(d)(2) and (3).</p> <p><b>Recommendation Implemented:</b><br/> Not implemented<br/> 2023 Update:<br/> Proposed revisions to policies covering Watch Commander Service Report (the protocol for filing and tracking complaints to the Sheriff’s Department) and a handbook for Watch Commander Service Comment Reports (WCSCR) were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff’s Department.<br/> The Sheriff’s Department reports that the handbook and policy revisions edit the definitions of “Exonerated” and “Unfounded” to require that the standard for those findings is “clearly established” rather than “preponderance of the evidence,” as required by the California Penal Code. Section 832.5(d). The Sheriff’s Department must ensure that any revised policy deletes any reference to preponderance of the evidence standard as it relates to finding of exonerated or unfounded and that the policy require “clearly established” as the standard for these findings.</p> | <p>The Department’s definitions of Unfounded and Exonerated do not align with the California Penal Code. The Department uses Unfounded when the investigation establishes by a preponderance of evidence that an allegation is not true. In contrast, California Penal Code section 832.5(d)(2) states “Unfounded” means that the investigation clearly established that the allegation is not true. Similarly, California Penal Code section 832.5(d)(3) states “Exonerated” means that the investigation clearly established that the actions of the peace or custodial officer that formed the basis for the complaint are not violations of law or department policy. Thus, unlike the Sheriff’s Department’s policy, the Penal Code imposes a higher burden of proof before a law enforcement agency can decide that a case is Unfounded or Exonerated.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE  |
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| <p><b>4</b> The Sheriff's Department's Professional Standards Division should take a more active role in monitoring those cases assigned to unit personnel for investigation to ensure the cases are handled appropriately. This would address the possibility that station standards as to "reasonable" conduct may vary throughout the Department.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering Watch Commander Service Report (the protocol for filing and tracking complaints to the Sheriff's Department) and a handbook for Watch Commander Service Comment Reports (WCSCR) were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> | <p>An Office of Inspector General inquiry revealed inconsistencies on how the Sheriff's Department tracks complaints in allegations-of-force cases. In some stations, accounting for allegation-of-force cases is straightforward – they are handled in the same manner as a public complaint of excessive force and documented in PRMS. In some stations, they are handled as an allegation-of-force inquiry, which is documented in a memorandum and forwarded to the Discovery Unit for tracking if it is determined that there is no validity to the allegation. And in other stations, they are subjected to various scenario-based questions to determine whether they will be investigated as a public complaint, a force case, or a criminal or administrative investigation and tracked in PRMS.</p> |
| <p><b>5</b> We recommend patrol deputies be required to use body-worn cameras. Availability of video evidence is critical to ensuring that excessive force is properly identified when it occurs.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>As of August 24, 2022, the Sheriff's Department has deployed 3,786 body worn cameras including all Patrol stations.<br/>2023 Update:<br/>As of August 31, 2023, the Sheriff's Department has issued 4,195 body-</p>   | <p>Availability of video evidence is critical to identifying problematic incidents while ensuring transparency and accountability.</p>  |

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p>worn cameras to deputies working in the field.</p>   |  |
| <p><b>6</b> We recommend that all citizen complaints alleging unreasonable force be documented as service comment reports even if a full inquiry is deemed unnecessary before referring the case for an administrative or criminal investigation. Such documentation is necessary to track how many unreasonable force investigations are initiated by citizen complaints.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering Watch Commander Service Report (the protocol for filing and tracking complaints to the Sheriff's Department) and a handbook for Watch Commander Service Comment Reports (WCSCR) were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> <p>The Sheriff's Department reports it is seeking to implement department-wide technology systems to document and track use-of-force allegations and WCSR's.</p> | <p>The Sheriff's Department does not track citizen complaints of unreasonable force in the same consistent manner throughout its 23 stations. In some stations, complaints of unreasonable force are tracked in its internal PRMS system while in other stations these complaints are only documented in a memorandum. This inconsistent treatment increases the possibility of masking systemic issues or not identifying instances of employee misconduct.</p> |

**LOS ANGELES COUNTY SHERIFF'S DEPARTMENT SAFETY OF  
FIREARMS POLICY  
Published October 2019**

| RECOMMENDATION  | ORIGINAL ISSUE  |
|---|---|
| <p><b>1</b> The Sheriff's Department's blood alcohol content standard in its Safety of Firearms Policy (MPP 3-01/025.45) should be .02 The standard of .08 blood alcohol content (BAC) level stated in the current Safety of Firearms policy is too high.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> | <p>The Office of Inspector General has reviewed DUI cases in which the deputy involved was carrying or in possession of a firearm at the time of the arrest. The Sheriff's Department has a policy of prohibiting employees from having a BAC of .02 while working or while operating county vehicles. The Minneapolis Police Department prohibits its off-duty employees from carrying a gun while having a BAC over .02, which the Office of Inspector General opines is a best practice.</p> |
| <p><b>2</b> Sheriff's Department Safety of Firearms policy should include prohibition of carrying firearms while consuming alcohol in establishments that serve alcohol.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>  | <p>The Sheriff's Department's Safety of Firearms Policy does not include a prohibition for carrying firearms in bars. There are reported cases of law enforcement officers using guns after leaving a bar, indicating the officer was armed while at the bar. The Cincinnati Police Department has a prohibition against police officers drinking in bars, a policy which the Office of Inspector General opines is the best practice.</p>  |
| <p><b>3</b> The rebuttable presumption language of the Sheriff's Department's Safety of Firearms policy should be removed.</p>  | <p>The rebuttable presumption language in the Sheriff's Department's Safety of Firearms policy undermines the intent of the policy and</p>  |



| RECOMMENDATION  | ORIGINAL ISSUE   |
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| <p><b>Recommendation Implemented:</b><br/>Not implemented</p>   | <p>could create confusion in interpreting the policy.</p>  |
| <p><b>4</b> There should be an "emergency exception" to the Safety of Firearms policy that allows a deputy who has been consuming alcohol to arm him or herself in emergency situations that require quick action to protect human life.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>  | <p>The Office of Inspector General acknowledges the possibility of an off-duty deputy being placed in a life and death situation while consuming alcohol. The proposed .02 limit should not prevent a deputy from engaging in conduct necessary to protect human life.</p> |
| <p><b>5</b> Add language similar to the Sheriff's Department's MPP 3-01/090.10 Operations of Vehicles MPP section 3-01/090.10, which states that "... if member has an odor of alcoholic beverage or there is a reasonable suspicion to believe member is under the influence of alcohol the unit commander or higher shall order a test of the member. If the member refuses a direct order to be tested the member shall be subject to discipline." This language should be added to the MPP section on Safety of Firearms.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> | <p>The language in Sheriff's Department alcohol related policies should be consistent.</p>   |
| <p><b>6</b> The Sheriff's Department should create a policy that requires unit commanders to order a deputy to submit to an alcohol test in all off duty accidental discharges.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>   | <p>Because there is no policy requiring alcohol testing when a deputy accidentally discharges a firearm, there is no evidence as to whether alcohol played a factor in the firearm being accidentally discharged.</p>  |

**REVIEW OF THE INMATE RECEPTION CENTER INTAKE EVALUATION  
PROCESS, NOVEMBER 2019  
Published November 2019**

| RECOMMENDATION  | ORIGINAL ISSUE  |
|---|---|
| <p><b>1</b> The Sheriff's Department should reevaluate the feasibility and safety of the plan to transport IRC Clinic patients to Urgent Care for medical clearance unless patients otherwise require that level of care.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented as of 2023.</p>  | <p>When Custody personnel transport IRC patients to Urgent Care for evaluations, they are required to remain with the patients until they are seen and then to escort them to their next housing location. Requiring personnel to transport some patients with a mental illness requiring fixed restraints may increase the risk of force.</p>  |
| <p><b>2</b> The Sheriff's Department should dedicate sufficient Custody Division personnel to expand Urgent Care to twenty-four hours a day. (This requires collaboration with CHS and an increase in CHS staffing to operate Urgent Care twenty-four hours a day.)</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented</p>  | <p>Since the establishment of Urgent Care in Twin Towers Correctional Facility, wait times for housed patients with medical needs had decreased and quality of care had improved. However, at the time of the report, Urgent Care maintained hours of 6:00 a.m. to 10:00 p.m. daily.</p>  |
| <p><b>3</b> The Sheriff's Department should maintain adequate mental health housing for prisoners with moderate and severe mental illnesses.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff's Department reports that additional Moderate Observation Housing is available in PDC-North. However, the LASD Custody Division and CHS remain understaffed. Ensuring sufficient care requires adequate staffing to address the mental health needs of persons in</p> | <p>The steadily increasing populations of prisoners with moderate and severe mental illnesses has led to the Moderate Observation Housing and High Observation Housing modules often nearing or reaching capacity. When these modules are full, new patients who present with moderate or severe mental illnesses—some of whom are tethered throughout the entire intake process—are required to remain in the Inmate Reception Center (IRC) Clinic</p> |

| RECOMMENDATION   | ORIGINAL ISSUE   |
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| <p>custody. While adding beds may assist with the movement of persons in custody from IRC to permanent housing, the lack of adequate staffing has resulted in jail conditions that fall below constitutional standards.</p>  | <p>or Module 231 (a dedicated IRC Clinic overflow module) for several additional hours until appropriate housing becomes available.</p>  |
| <p><b>4</b> CHS, in collaboration with the Sheriff's Department, should identify and implement a tracking mechanism that can generate real-time and aggregate population data about mentally ill prisoners and their current mental health classifications.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff's Department reports that the MHIT INTAKE program tracks persons in custody and their level of care in real time prior to their movement to assigned housing in intake areas (TTCF Supplemental Assessment Team locations and CRDF Module 1400). According to the Sheriff's Department, MHIT allows for the updating of mental health disposition and calculates the number of days a person has been in intake housing. The Department uses MHIT as a tool to assist with reducing wait times in intake housing areas to no more than seven days before transferring the person to permanent mental health housing. The Department reports that it is in the process of implementing a Jail Management System.</p> | <p>Effective population management requires adequate information technology infrastructure. The Sheriff's Department reports that its current technology infrastructure is outdated. This presents ongoing challenges with tracking the population in real-time and optimizing prisoner movement and housing availability.</p> |
| <p><b>5</b> The Sheriff's Department should work with the courts and other County partners to explore the feasibility of revising the bus schedule as</p>  | <p>The influx of prisoners that arrived at the IRC in the late afternoon and evening hours added to existing backlogs in</p>   |

| RECOMMENDATION  | ORIGINAL ISSUE   |
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| <p>necessary to conduct additional transports throughout the day and reduce IRC Clinic backlogging.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff Department reports that changes within IRC pursuant to the Rutherford Joint Settlement Agreement (JSA) arising out of the litigation filed by the ACLU in <i>Rutherford v. Luna</i> concerning untenable conditions, have reduced wait times. According to the Department, the implementation of a Shared Intake Movement System (SIMS) enables the Department and other County entities involved in intake processing to accurately track processing times in order to avoid violations of the JSA. The Sheriff's Department reports that it is procuring additional buses to enhance the ability to make scheduling adjustments.</p> | <p>the intake process. CHS contended that revising the bus schedule to conduct additional transports throughout the day could stagger the incoming prisoner population and potentially alleviate some backlogging in the IRC Clinic.</p>   |
| <p><b>6</b> The Sheriff's Department should immediately implement and maintain adequate staffing of Custody Division personnel in the IRC Clinic during all shifts to transport patients as needed and without delay.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff's Department reports that per the JSA that IRC has maintained adequate Clinic staffing to assist with transporting persons to housing. According to the Sheriff's Department, IRC reports compliance via SIMS since July 2023, with only one violation in September 2023.</p>  | <p>Custody Division personnel transport patients from the IRC Clinic to permanent housing locations upon completion of all required evaluations. When the IRC Clinic is understaffed, Custody Division personnel are not always readily available to transport patients, resulting in additional delays.</p> |

| RECOMMENDATION  | ORIGINAL ISSUE  |
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| <p>However, the LASD Custody Division and CHS remain understaffed. Without sufficient staff, reforms in IRC are unlikely to prevent recurring negative outcomes. The lack of adequate staffing has resulted in jail conditions that fall below constitutional standards.</p>  |   |
| <p><b>7</b> The Sheriff's Department should rescind the IRC Unit Order regarding fixed restraints or revise it to ensure it complies with the Custody Division Manual (CDM).</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented</p>   | <p>The Sheriff's Department's IRC Unit Order regarding fixed restraints modified tethering procedures beyond the scope of the CDM and loosened requirements related to basic human needs. In addition, the Unit Order was void of key safeguards that were outlined in the CDM.</p> |
| <p><b>8</b> The Sheriff's Department leadership should identify and implement all additional strategies necessary to eliminate backlogging, excessive wait times, long periods of patient tethering, squalor, and other potentially dangerous or inhumane conditions of confinement in the IRC.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>2023 Update: On September 16, 2022, in response to an emergency motion filed by the ACLU in <i>Rutherford v. Luna</i> due to untenable conditions in the IRC, a federal judge issued a Temporary Restraining Order prohibiting the Sheriff's Department from holding people in the IRC beyond 24 hours and from tethering anyone in the front bench area for more than 4 hours. The Court also ordered the Sheriff's Department keep the IRC clean, provide functional</p> | <p>Despite warnings by the Office of Inspector General against long-term tethering, patients continue to encounter excessive wait times in unsanitary conditions while tethered to chairs. At times, patients have remained tethered for nearly twenty-four hours.</p>              |

| RECOMMENDATION   | ORIGINAL ISSUE  |
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| <p>toilets, drinking water, food, and adequate medical and mental health care, including medications for psychiatric and chronic medical conditions. The TRO was then made permanent by a preliminary injunction and ultimately the parties entered into a Joint Stipulation Agreement. Since then, the Sheriff's Department implemented several remedial measures to address the root causes of delays and deteriorating conditions in the IRC to ensure compliance with the Preliminary Injunction. One noteworthy measure is the implementation of a new data tracking system – the SIMS – in the IRC, which tracks, in real time, for each incarcerated person in the IRC the following information: (1) how long that person has been in the IRC; (2) whether, and for how long, that person has been handcuffed, chained, or tethered in any other way in the Front Bench Area of the IRC; and (3) how long that person has been locked in an IRC holding cell or IRC cage. The SIM System alerts IRC staff when there are any violations of the wait time limits set forth in the Preliminary Injunction. In light of the improved conditions, the parties met and conferred and entered into a joint stipulation for the Sheriff's Department to maintain the remedial efforts, which was approved by the court on June 22, 2023. The OIG regularly monitored the IRC throughout this period and noted significant improvements in wait times and conditions at the IRC.</p> |   |
| <p><b>9</b> The Sheriff's Department should identify a timeframe beyond which patients awaiting housing in the IRC</p>   | <p>In-custody patients who required medical evaluations in the IRC Clinic encountered</p> |

| RECOMMENDATION  | ORIGINAL ISSUE   |
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| <p>Clinic or Module 231 are released from custody if safe, adequate housing remains unavailable.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented;<br/>2023 update:<br/>The Sheriff's Department reports that as of the implementation of the Joint Stipulation Agreement arising out of litigation filed by the ACLU in <i>Rutherford v. Luna</i>, concerning untenable conditions in IRC, that IRC has collaborated with CHS to significantly reduce the wait time for persons being processed as they enter the custodial facilities. The Department also reports the implementation of SIMS to track compliance with wait time limits.</p> | <p>excessive wait times that, at the time of the report, exceeded forty-eight hours in cramped and crowded quarters, resulting in sleep deprivation and posing safety risks for patients and staff. The appropriate remedy for inability to provide for humane treatment is release.</p> |

### 2020 Reports<sup>3</sup>

| 2020 Recommendations |       |
|----------------------|-------|
| Status               | Total |
| Implemented          | 2     |
| Not Implemented      | 13    |

## SECOND REPORT BACK ON THE LASD'S DEPARTMENT'S PLAN TO UPGRADE THE DATA SYSTEMS USED TO TRACK JAIL VIOLENCE

Published April 2020

### USE-OF-FORCE TRACKING RECOMMENDATIONS:

| RECOMMENDATION  | ORIGINAL ISSUE  |
|---|---|
| <p><b>1</b> Any change to the categorization of a use-of-force in the Electronic Line Operations Tracking System (e-LOTS)</p> | <p>E-Lots is a database used by Custody Support Services Bureau (CSS) to report and</p> |

<sup>3</sup> For 2020, no additional recommendations were adopted by the current administration.



| RECOMMENDATION  | ORIGINAL ISSUE  |
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| <p>database, should be immediately communicated to the Risk Management Bureau Discovery Unit so those changes can be timely updated in Performance Recording and Monitoring System (PRMS). This will ensure that the use-of-force totals and categories of force recorded in e-LOTS and PRMS are consistent.</p> <p><b>Recommendation Implemented:</b><br/> Not implemented<br/> 2023 update:<br/> The Sheriff’s Department reports that it is evaluating a system that will automate the process of updating records electronically resulting in real-time updates. In the interim, the Risk Management Bureau Discovery Unit (Discovery Unit) and the CSS are working together to implement changes, including electronic notice by email of force category changes, to ensure updates in PRMS are made more quickly. Additionally, the Department reports that Custody Support Services Bureau met with the Discovery Unit regarding this issue and the Department will direct facilities to contact staff responsible for PRMS data entry upon a force category change. In order to achieve implementation, at a minimum the Sheriff’s Department should adopt a policy that requires reporting of a change in force category and that a supervisor be responsible for ensuring the change is reported.</p> | <p>compile use-of-force data. Although the Office of Inspector General found a high degree of correlation between the PRMS and e-LOTS totals, the Sheriff’s Department reported that a PRMS/e-LOTS reconciliation can only be conducted on a yearly basis due to the time it takes for a use-of-force investigation to be completed and input into PRMS.</p> <p>Implementing a process by which any changes to the use-of-force categories in the e-LOTS system are immediately transmitted via an e-mail message to the Discovery Unit for input into PRMS, would allow for near real-time updates to PRMS and allow CSS to reconcile e-LOTS and PRMS at least on a monthly basis.</p> |

| RECOMMENDATION  | ORIGINAL ISSUE   |
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| <p><b>2</b> The Risk Management Bureau should conduct quality control checks of all updates to PRMS files to ensure that force packages are updated in PRMS with the most current information.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff’s Department reports that it is evaluating a system that will automate the process of updating records electronically resulting in real-time updates. The Department reports that the Discovery Unit has identified and communicated to command staff the backlogs of overdue force packages. The backlog of eForce submission is currently 830 packages due to late submission to the Discovery Unit. The Sheriff’s Department reports that without an increase in staff for the Discovery Unit and/or a new technology system, it is unable to implement the recommended quality control checks at this time.</p> | <p>Although the Office of Inspector General found a high degree of correlation between the PRMS and e-LOTS totals, the Sheriff’s Department reported that a PRMS/e-LOTS reconciliation can only be conducted on a yearly basis due to the time it takes for a use-of-force investigation to be completed and input into PRMS.</p> <p>Implementing a quality control check will ensure that PRMS is updated with the most current information and identify areas of non-compliance with the protocol for sending updates to the Discovery Unit and timely entry of updated information in PRMS.</p> |
| <p><b>3</b> CSS should conduct a thorough reconciliation of the e-LOTS and PRMS systems to ensure the overall use-of-force totals and individual categories of force are identical in both systems. This is important as PRMS is the Sheriff’s Department’s official repository of personnel performance information and must reflect the most current information.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff’s Department reports that it is evaluating a system that will automate the process of updating</p>   | <p>The Office of Inspector General’s reconciliation of the use-of-force data between e-LOTS and PRMS revealed a difference of five cases (2118 vs. 2113 respectively) and greater variance in the categories of force totals. The Sheriff’s Department reported that a reconciliation between PRMS and e-LOTS has not been conducted since 2018.</p>   |

| RECOMMENDATION   | ORIGINAL ISSUE |
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| records electronically resulting in real-time updates. |                |

### INMATE ASSAULT TRACKING RECOMMENDATIONS:

| RECOMMENDATION  | ORIGINAL ISSUE  |
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| <p><b>1</b> The Sheriff’s Department should develop an automated Los Angeles Regional Crime Information System (LARCIS) exception report that identifies all crime reports that do not have a Custody Division Crime Analysis Form (CSDCAF) attached. Currently, Custody Investigative Services (CIS) staff must identify reports without CSDCAFs by visually scanning through a query result on a computer monitor that is NOT printable or downloadable thereby increasing the possibility of user error.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff’s Department reports that a Request for Proposal (RFP) for the replacement of LARCIS scheduled for release in first quarter of 2024 and that funding for a system to replace LARCIS has been identified. It is estimated it will take approximately two years before the system can be replaced.</p> | <p>The CSDCAF is a supplemental checkbox form that identifies the actions of the suspect, locations specific to Custody Services Division facilities, and specific suspect and victim information. Data from the CSDCAF is used to generate the LARCIS 9A exception report which is the sole source for published inmate-on-inmate and inmate-on-staff assault data. The absence of a CSDCAF from a crime report would result in the underreporting of inmate assaults.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE   |
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| <p><b>2</b> The Sheriff’s Department should expand LARCIS reporting to capture and report the total number of victims, broken down by type of assault for incidents involving multiple victims.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>The Sheriff’s Department reports that it conducts monthly, quarterly, and annual audits to correct missing or incomplete information. Conducting monthly audits is not the same as expanding LARCIS reporting to capture and report on the total number of victims broken down by type of assault for incidents involving multiple victims. Additionally, without a verifiable audit by LASD’s Audits and Accountability Bureau (AAB), OIG is unable to verify whether Sheriff’s Department audits are sufficient in addressing this recommendation.</p> | <p>Although the Office of Inspector General’s review found that the Sheriff’s Department’s interim procedures for reporting inmate assaults are yielding consistent and replicable results when reporting individual incidents, when reporting incidents involving multiple victims the Sheriff’s Department was unable to provide the number of total victims in an incident.</p> |
| <p><b>3</b> The Sheriff’s Department should continue its LARCIS and crime report trainings as outlined in Informational Bulletin #2017-11 and CIS Training Bulletin dated February 7, 2018.</p> <p><b>Recommendation Implemented:</b><br/>Partially implemented<br/>2023 update:<br/>The Sheriff’s Department reports that the COVID pandemic resulted in the Department falling behind in this training but that training per this recommendation continues.</p>  | <p>On-going training at regular intervals is essential to maintaining consistent and accurate reporting and data entry.</p>  |

## ENSURING THE LONG-TERM VIABILITY OF THE FAMILY ASSISTANCE PROGRAM

Published October 2020

| RECOMMENDATION  | ORIGINAL ISSUE  |
|---|---|
| <p><b>1</b> The Sheriff’s Department should ensure that appropriate barriers are erected at the scene of all deputy-involved shootings as soon as the evidence in the immediate area of the deceased has been processed.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented</p>   | <p>While evidence is identified and collected the Sheriff’s Department Homicide Bureau is charged with maintaining the dignity of the deceased by working with Coroner’s personnel to have the deceased person transported from the scene as soon as practicable and by placing visual barriers to shield the deceased from public view until Coroner’s personnel remove the decedent.</p>  |
| <p><b>2</b> The Sheriff’s Department and the Coroner should coordinate their efforts in order to facilitate the prompt transportation of the deceased. When possible, the Sheriff’s Department should prioritize evidence collection and scene processing in a manner that allows for the prompt transportation, such as first processing the area immediately around the deceased and allowing the Coroner to start its investigation once that is done.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff’s Department reports that for deputy-involved shootings it strives to conduct investigations as quickly and compassionately as possible while ensuring that the investigations are conducted systematically and consistent with established protocols to withstand</p> | <p>In deputy-involved shooting cases, the Sheriff’s Department typically notifies the Coroner when the deceased is pronounced dead at the scene. Coroner’s personnel do not respond to the scene at the time of the first notification because Homicide investigators have not completed processing the crime scene. There is a general concern that the process of removing the deceased might disturb the scene or interfere with the evidence collection process. Because the collection of evidence is a lengthy process, the deceased may remain at the scene for hours prior to the arrival of Coroner’s personnel.</p> |

| RECOMMENDATION  | ORIGINAL ISSUE |
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| judicial, Departmental administrative, and public scrutiny. |                |

**ANALYSIS OF THE CRIMINAL INVESTIGATION OF THE ALLEGED ASSAULT BY BANDITOS**  
**Published October 2020**

| RECOMMENDATION  | ORIGINAL ISSUE  |
|---|---|
| <p><b>1</b> The Sheriff’s Department should thoroughly investigate internal criminal allegations. A thorough investigation includes investigating possible motives of the suspects as well asking questions that would elicit information as to a witness’s potential bias. Investigators should follow all LASD policies and procedures and should apply the same investigative practices to investigations relating to alleged gang behavior of deputies as would be employed in the investigation of a serious crime by a suspect who is not an employee of the Sheriff’s Department.</p> <p><b>Recommendation Implemented:</b><br/> Not implemented<br/> 2023 update:<br/> Based on OIG’s real-time monitoring of ICIB investigations the Sheriff’s Department has not undertaken any investigation of deputy-gangs.</p> <p>The Sheriff’s Department reports that as of September 2023, a new procedure has been instituted whereby ICIB casebooks are reviewed by the Office of Constitutional Policing (OCP) before submission to the District Attorney’s Office for filing consideration. The OCP reports that its review includes a determination as to the necessity of additional</p> | <p>The Office of the Inspector General’s review of the Sheriff’s Department’s investigation of the Kennedy Hall assault case revealed that the Sheriff’s Department Internal Criminal Investigations Bureau (ICIB) only asked one witness if the suspects were Banditos, did not ask if the bullying by the suspects of the victims was ordered by the Banditos or was a common practice by the Banditos. While ICIB asked numerous questions regarding tensions between older and young deputies, there were no follow-up questions as to whether any of the older deputies were associated with the Banditos or any other subgroup. A sergeant told the investigators that the tensions were between those who associated with the Banditos and those who did not, but the investigators did not probe the role that membership in the Banditos played in the assaults. By not fully exploring the Banditos connection to this incident, ICIB did not fully investigate the motive of the assaults. There was no effort</p> |

| RECOMMENDATION  | ORIGINAL ISSUE  |
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| <p>investigation, including whether the allegations relate to deputy gangs, cliques, or subgroups. The OCP reports advising PSD that it will review investigations that ICIB recommended not be submitted for filing consideration for concurrence or nonconcurrence with the ICIB decision.</p>  | <p>to identify any deputy association with secret subgroups.</p>  |
| <p><b>2</b> The Sheriff’s Department should compel statements from all witness deputies who do not invoke their right against self-incrimination. In cases in which a witness employee invokes the Fifth Amendment but is not a subject of the criminal investigation the Sheriff’s Department should compel a statement when appropriate.</p> <p><b>Recommendation Implemented:</b><br/> Not implemented<br/> 2023 Update:<br/> The Sheriff’s Department shared a proposed directive with OIG regarding the assertion of rights and privileges by Sheriff’s Department investigators. OIG expressed concerns about sending a directive that potentially coached investigators not to answer questions. OIG is not aware whether the directive was distributed.</p> <p>The Sheriff’s Department reports that this recommendation is in progress, acknowledging that MPP 3-01/040.85 requires employees to cooperate with criminal investigations but lacks guidance as to steps Department investigators should take when employees refuse to comply with the MPP. The OCP reports it is working with County Counsel and PSD to formulate guidelines for compelling employees consistent with the MPP</p> | <p>The Office of Inspector General’s review shows no basis for the assertion of a Fifth Amendment privilege as to many of the deputies who refused to give a statement. In fact, none of the deputies who declined to be interviewed asserted the Fifth Amendment right against self-incrimination.</p> |



| RECOMMENDATION                              | ORIGINAL ISSUE |
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| and the constitutional rights of employees. |                |

**USE OF FORCE REPORTING IN PATROL STATIONS AND CURRENT USE OF FORCE ISSUES**  
**Published November 2020**

| RECOMMENDATION   | ORIGINAL ISSUE   |
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| <p><b>1</b> The Sheriff’s Department should immediately ban all types of neck holds due to their potential to cause unnecessary harm to the person subjected to such force and since deputies have other less lethal options at their disposal.</p> <p><b>Recommendation Implemented:</b><br/> Yes, implemented as required by law. (Government Code section 7286.5 banning choke holds was signed by the Governor on September 30, 2020.)</p>                                 | <p>As of the report date, the Sheriff’s Department had no policies on neck holds. The Board of Supervisors, other local and state governments in the United States, and the Federal Government have advocated banning chokeholds, which are neck holds that restrict the flow of oxygen in order to incapacitate an individual. Other jurisdictions that have banned neck holds have proven neck holds are not necessary to protect the lives of law enforcement officers given that there are other tools available to them that do not impact vital areas of the human body.</p> |
| <p><b>2</b> The Sheriff’s Department should track and publish data on the number of times deputies unholster and point their firearm at a person and under what circumstances.</p> <p><b>Recommendation Implemented:</b><br/> Not Implemented<br/> As of November 7, 2017, the California Racial and Identity Profiling Act of 2015 (RIPA) requires the Sheriff’s Department to include in its reports, beginning in April 2019, each time a deputy pointed a firearm at a</p> | <p>Case law across various jurisdictions have found the mere act of a police officer pointing a gun at someone may constitute <b>excessive</b> force and/or be considered a seizure under the 4th Amendment. If pointing a gun has been found to be excessive force, pointing a gun at an individual should be considered a use of force.</p>  |

| RECOMMENDATION  | ORIGINAL ISSUE |
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| <p>person. (California Code of Regulations 999.226 subdivision (a)12(A)(8).</p> <p>2023 Update:<br/>Proposed revisions to policies covering the use of force were presented to the Office of Inspector General in July 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff’s Department.</p> <p>The Sheriff’s Department reports that beginning January 2024 data tracking will include the unholstering of a firearm.</p> |                |

**REPORT BACK TO THE CIVILIAN OVERSIGHT COMMISSION ON ALLEGATIONS OF HARASSMENT OF FAMILITES BY LASD PATROL OPERATIONS STAFF FOLLOWING A FATAL USE OF FORCE BY LASD**  
**Published November 2020**

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| <p><b>1</b> It is the recommendation of the Office of Inspector General that the Sheriff’s Department adopt a policy in order to ensure sensitivity toward those grieving at a memorial site and to build community trust following a fatal use of force.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented; the Office of Inspector General was provided with a draft memorial policy and made recommendations for changes to the policy.<br/>2023 update:<br/>A proposed Memorial Vigils policy was presented to the Office of Inspector General in December 2023 but has</p> | <p>It has been alleged by numerous family members attending memorial sites and vigils for loved ones who had been killed by a Sheriff’s Deputy’s fatal use of force that deputies patrolling those areas exhibited behavior towards the families that was perceived as harassment.</p> |
|---|--|

|                 |  |   |
|-----------------|--|---|
|                 | <p>not been adopted; the Office of Inspector General provided comments on the proposed policy for consideration by the Sheriff's Department.</p>   |   |
| <p><b>2</b></p> | <p>To increase public trust the Sheriff's Department should ensure that the investigations of complaints are thorough, including seeking out any available video evidence of the conduct described in the complaint.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering Watch Commander Service Report (the protocol for filing and tracking complaints to the Sheriff's Department) and a handbook for Watch Commander Service Comment Reports (WCSCR) were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> | <p>In a review of complaints relating to family harassment, the Office of Inspector General found that some of the investigations conducted by LASD were not thorough. In at least two investigations, there were indications that additional investigation might have resulted in the discovery of video evidence to determine the veracity of the allegations. In another investigation, video was requested but there was no follow up despite the known existence of surveillance cameras. The very low possibility that public complaints will lead to any discipline for misconduct also contributes to a lack of public trust when it comes to LASD investigating its own personnel.</p> |
| <p><b>3</b></p> | <p>The Sheriff's Department should adopt policies and training to ensure that all complaints are classified properly.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering Watch Commander Service Report (the protocol for filing and tracking complaints to the Sheriff's Department) and a handbook for Watch Commander Service Comment Reports (WCSCR) were presented to</p>   | <p>In conducting a review of family harassment cases, the Office of Inspector General found it difficult to identify all potential complaints of harassment as the Sheriff's Department does not consistently identify them as such. Some complaints that would constitute harassment were classified as discourtesy, discrimination and "other". The failure to have a consistent classification of these types of cases can hinder the</p>  |

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| the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department. | identification of problem areas or employee misconduct. Misclassification of complaints may also lead to the masking of systemic issues. |
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## 2021 Reports<sup>4</sup>

| 2021 Recommendations |       |
|----------------------|-------|
| Status               | Total |
| Implemented          | 10    |
| Not Implemented      | 43    |

### REFORM AND OVERSIGHT EFFORTS: LOS ANGELES COUNTY SHERIFF'S DEPARTMENT OCTOBER TO DECEMBER 2020 Published February 2021

| RECOMMENDATION   | ORIGINAL ISSUE   |
|--|--|
| <b>1</b> The Sheriff's Department should implement similar policies as the LAPD for consent searches. In November 2020, LAPD modified their policy to include obtaining written or verbal consent during consensual searches to search a person, their personal property, premise, or vehicle. The policy requires the consent be in written form or if verbal to be recorded on the officer's body- | The Sheriff's Department does not require its deputies to advise civilians they have the right to refuse a consensual search. Deputies are not required to capture on a BWC that the civilians have a right to refuse the search, to capture such searches, or to narrate the search as it is being conducted. |

<sup>4</sup> For 2021, the recommendations relating to access to body-worn camera videos and PRMS access were implemented by the current administration, which results in the adoption of four access recommendations, although three relate to body-worn camera access. Additionally, the adoption of a state law in September 2021 resulted in the Sheriff's Department adopting the Office of Inspector General's recommendation on the use of projectiles in response to protests. Thus, a total of five of the 2021 recommendations were adopted by this administration. For the report added in 2021, covering misconduct and discipline, three of the recommendations were already Sheriff's Department policy. The total for 2021 therefore shows the adoption of nine recommendations, five of which were adopted by this administration, one of which was adopted by the previous administration, and three recommendations relating to misconduct investigations and discipline, which were already Sheriff's Department policy.

| RECOMMENDATION  | ORIGINAL ISSUE  |
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| <p>worn camera (BWC).</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff’s Department reports that this recommendation is under consideration.</p>  |   |
| <p><b>2</b> The Office of Inspector General strongly recommends LASD’s policies include language prohibiting deputies from utilizing photographs from or employing third-party facial recognition software. The draft policy should be provided to the Sheriff’s Civilian Oversight Commission and the Office of Inspector General for comment prior to its adoption.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> | <p>In recent months, LAPD has received criticism about its officers using third-party software for facial recognition purposes. LARCIS representatives, who also provide services to the LAPD, are aware of LAPD employees’ practice of using third-party facial recognition software. LARCIS relates that it does not use such software, does not train officers to use such software, and strongly recommends agencies not use such software because these open-source software are prone to manipulation and are not as stringently maintained as the photographs in the Department of Justice’s data systems.</p> |

**LOS ANGELES COUNTY SHERIFF'S DEPARTMENT'S: REVIEW AND ANALYSIS OF MISCONDUCT INVESTIGATIONS AND DISCIPLINARY PROCESS**

**Published February 2021**

***Note: Recommendations from this report were not included in the Office of Inspector General's 2022 Report Card.***

***Several recommendations contemplated the creation of an outside independent investigative agency but apply equally to Sheriff's Department investigations and are included with modifications.***

| RECOMMENDATION   | ORIGINAL ISSUE  |
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| <p><b>1</b> Imposition of Discipline:<br/>The discipline [if any] for each employee should be selected by the employee's unit commander or higher ranking authority based upon:</p> <ul style="list-style-type: none"> <li>•The hearing officer's findings as to:</li> <li>•Facts;</li> <li>•Policy violations;</li> <li>•Aggravating and mitigating factors;               <ul style="list-style-type: none"> <li>-Severity of infraction</li> <li>-Aggravating factors</li> <li>-Mitigating factors</li> <li>-Intent, truthfulness and acceptance of responsibility</li> <li>-Degree of culpability</li> </ul> </li> <li>•The Department's guidelines to discipline for the violations found by the hearing officer; and</li> <li>•The employee's past performance and disciplinary history</li> </ul> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>This reflects current Department policies.</p> | <p>This recommendation generally reflects current Department administrative policies.</p> <p>However, the Department should further focus on whether it implements these policies in an objective, fact-based, and unbiased manner.</p> |
| <p><b>2</b> Settlement of Cases:<br/>If an employee chooses to resign or retire after a hearing has been commenced at the employee's request, the hearing should continue, findings should be issued and the appropriate discipline should be imposed as a matter of record.</p>   | <p>This recommendation addresses the issue of the lowering of discipline for founded misconduct by Department fact finders.</p>   |

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|   | <p><b>Recommendation Implemented:</b><br/>2023 Update:<br/>Yes, as required by law. Beginning in 2023, California law requires law enforcement agencies to complete investigations of allegations of serious misconduct by a peace officer, regardless of their employment status. Penal Code § 13510.8(c)(1). While this recommendation originally contemplated creation of an independent investigative and adjudicative unit, it applies equally well to investigations and adjudications conducted by the Sheriff’s Department.</p> |  |
| 3 | <p>Appeals:<br/>Appeals should continue to be heard as currently provided by statute and the rules of the Civil Service or Employee Relations commissions, with the exception that the commissions' and hearing officers' findings of facts shall be based upon the factual record as established at the hearing held prior to the imposition of discipline.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>This tracks current laws and administrative rules.</p>  | <p>This recommendation generally tracks the current County appeals system.</p>   |
| 4 | <p>Define Affirmative Duties of Employees:<br/>The Department should, by policy, procedure and practice:</p> <ul style="list-style-type: none"> <li>• Impose a clear and unequivocal duty on all employees to report all violations of [any law, department or County policy, rules, regulations or supervisors’ orders].</li> </ul>  | <p>All Department employees and all levels must understand that there is an affirmative duty to report, document, and refer to Department Command staff all violations of law, administrative rules, policy, or regulations. Department policy does not impose a clear affirmative obligation on employees to report</p> |

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|  | <ul style="list-style-type: none"> <li>• Require unit commanders to document all allegations of violations of [any law, department or County policy, rules, regulations or supervisors' orders], whether the allegations are external or internal.</li> <li>• Impose an affirmative duty on all unit commanders and higher-ranking executives to ensure that all allegations of violations of any law, department or County policy, rules, regulations or supervisors' orders, are referred appropriately. [While this recommendation originally referred to a referral to the Office of Law Enforcement Standards, the Sheriff's Department' lacks authority to establish such an office, but can require its employees to report violations of policy and law to Department command staff.</li> </ul> <p><b>Recommendation Implemented:</b><br/>Not Implemented<br/>The Department reports agreement with this recommendation and is reviewing ways to ensure current policies are followed and whether additional policies are required.</p> <p>According to information provided by the Department, the Watch Commander Service Comment Report (WCSCR) is used to document external incidents during which there were violations of law or Sheriff's Department policies, rules, and regulations. The WCSCR also allows unit commanders and supervisors to</p> | <p>misconduct, nor on commanders and executives to document and investigation misconduct.</p> |
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|                 | <p>document service-related issues. Additionally, unit commanders may conduct inquiries, and ultimately initiate administrative and/or request criminal investigations for internal, or external allegations.</p>  |   |
| <p><b>5</b></p> | <p>Conform Rights Afforded Employees to California Law:<br/> The Department should extend "subject rights" only to those employees who are the subjects of administrative investigations. Interviews of employee witnesses in criminal cases should be conducted in conformance with investigative standards applicable to all other witnesses in all criminal investigations and not in conformance with the standards applicable to administrative investigations as outlined in the Public Safety Officer's Procedural Bill of Rights.</p> <p><b>Recommendation Implemented:</b><br/> Not implemented</p> <p>The Sheriff's Department reports that, while the Department does not select the attorneys who represent individuals in any investigation, it is reviewing a number of ways to ensure that all employees who seek representation have access to fair and unbiased representation.</p> | <p>In cases reviewed by the Office of the Inspector General, the Department often affords "subject rights" – the set of specific protections for <i>subjects</i> of investigations set forth in the California Public Safety Officers Procedural Bill of Rights – even to employees who are not subjects of an investigation, but are only witnesses. This includes the practice of allowing an interviewed witness to have an attorney present, which is often the same attorney that represents the actual subject of the investigation, who may have a legal and ethical obligation to share information about the contents of the witness interview with the subject of the investigation, and to use that information in the subject's defense. Such sharing diminishes the integrity of investigations.</p> |
| <p><b>6</b></p> | <p>Invocation of Privileges by Employees:<br/> Employees who invoke any privilege and refuse to provide evidence or statements should be required to personally invoke that privilege.</p> <p><b>Recommendation Implemented:</b><br/> Not implemented</p>  | <p>The Department appears to accept a verbal assurance from counsel that an employee will not submit to an interview by internal criminal investigators and will not seek an interview on that subject. The practice of not requiring that the employee personally advise the Department that he</p>  |

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|                 | <p>The Department reports that it is evaluating this recommendation and whether there is a material difference between invocation by an attorney versus the employee.</p>  | <p>or she does not wish to be interrogated effectively precludes the Department from compelling a witness employee to cooperate in a criminal investigation or disciplining and employee who has been ordered to cooperate but declines through an attorney to do so. This practice also precludes the Department from disciplining an employee who has been ordered to cooperate but through the suspect's (or any other) attorney declines to do so.</p>        |
| <p><b>7</b></p> | <p>Compliance of Attorneys with California's Conflict Rules:<br/>The attorney representing the subject of an administrative investigation should not be permitted to represent any other subject or witness in that investigation unless that attorney represents on the record to investigators that rule 1.7 of California's Professional Rules of Conduct has been fully complied with as to each person represented.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> <p>The Sheriff's Department reports that, while the Department does not select the attorneys who represent individuals in any investigation, it is reviewing a number of ways to ensure that all employees who seek representation have access to fair and unbiased representation.</p> | <p>The Department often allows an interviewed witness to have an attorney present, which is often the same attorney that represents the actual subject or multiple subjects of the investigation, who may have a legal and ethical obligation to share information about the contents of the interview with all subjects of the investigation, and to use that information in the subjects' defense. Such sharing diminishes the integrity of investigations.</p> |
| <p><b>8</b></p> | <p>Enforce a Duty of Honesty:<br/>The Department should develop, implement and adhere to policies</p>  | <p>Under prior administrations, the unit commanders and higher-ranking executives did</p>   |

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|  | <p>which impose an affirmative duty upon employees to tell investigators of all material facts within the knowledge of the employee, explicitly require employees to NOT omit any material fact in any criminal investigation or any administrative investigation or inquiry authorized by law no matter the entity conducting the investigation or inquiry.</p> <p>The Department should develop, implement and adhere to policies which make clear that witnesses have no right to evade, delay or avoid any questioning or conceal any evidence in any investigation or make for themselves a determination of what evidence is relevant (or not).</p> <p>The Department should restate its false statement and dishonesty policies so that there is no confusion among department members about what is a false statement and the consequences for making them.</p> <ul style="list-style-type: none"> <li>• The Department should adopt the definition of 'false' contained in the Black's Law Dictionary: False = untrue.</li> <li>• The Department should include in its false statement policies the definition contained in Penal Code section 125 since 1872, "An unqualified statement of that which one does not know to be true is equivalent to a statement of that which one knows to be false."</li> <li>• The Department should adopt guidelines for the discipline of false statements which distinguish between:</li> </ul> | <p>not agree whether the policy prohibiting false statements applied to statements that were untrue but were not determinative of the guilt or innocence of a criminal suspect or were made in defense of another deputy accused of misconduct. Previous Sheriffs took inconsistent approaches to tolerance for false statements and the severity of discipline for deputies who make false statements.</p> <p>In the Office of Inspector General's review of cases, some claims by deputies that they did not participate in particular events defy credulity. Similarly, failures of deputies to remember events were common, but were particularly acute when the witness deputies were asked to identify other deputies who were witnesses or participants in conduct that was the subject of the investigation. Department investigators not only fail to challenge these failures to observe or recall events, but frequently condone them by reassuring deputy witnesses that failures of recollection are to be expected and are not an issue.</p> |
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|  | <ul style="list-style-type: none"><li>○ False statements made with knowledge the statements are false (dishonesty)</li><li>○ False statements made when it is not known whether the statement is true or false (dishonesty)</li><li>○ False statements made due to the lack of competency of the employee to observe and relate</li><li>○ False statements made due to mistake of fact</li></ul> <p>• The Department should require employees whose defense to false statement and dishonesty charges is their competency under the circumstances to have observed, recorded or related their observations, to undergo fitness for duty examinations.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> <p>The Department reports that it agrees with this recommendation and plans to ensure that it has consistent messaging about false statements and the consequences associated with this violation. Enhancing training at the start of employees' careers, i.e., academy and entrance interviews, about this topic will be part of this effort. The Department has a current honesty policy and states it will re-brief the policy. According to information from the Department, a request for a fitness for duty for employees who use their competency as a defense, requires a determination from the Occupational Health Programs (OHP) as to whether</p> |
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|                  | <p>a fitness for duty examination may be conducted.</p>   |   |
| <p><b>9</b></p>  | <p>Require Employees to Cooperate with Government Investigations:<br/>The Department should develop, implement and adhere to policies which require full and complete cooperation by department employees in investigations, including employee misconduct investigations, which are conducted by other law enforcement for government agencies.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> <p>The Sheriff has instructed department employees to cooperate with the investigations of the Office of Inspector General into deputy gangs. However, the Department has taken no measures to enforce its policy regarding cooperation with criminal investigations. County Code and Department policy require individuals to cooperate with County investigations. The Department reports that it is planning training to ensure consistent enforcement of current policy.</p> | <p>Deputies are required by written policy to cooperate with investigations; however, the Office of Inspector General has identified a pattern of the Department allowing deputies to decline to provide information in investigations of their fellow deputies. The Department accommodates, sometimes encourages, and does not address even outright refusals by department employees to cooperate in criminal investigations, whether those criminal investigations are being conducted by the Department or other law enforcement agencies.</p> |
| <p><b>10</b></p> | <p>Harmonize Policies. Procedures and Practices:<br/>The Department should ensure that all procedures as embodied in any form, including training materials, unit orders, directives, or other communications, are in compliance with the Department's policy and that accepted practices are consistent with those procedures and with department policy.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>  | <p>Some Departmental directives are not adopted as policies, which may lead to inconsistent messaging. Best practice is to ensure that policies are adopted and disseminated to all Department personnel. Some Departmental policies, procedures, and practices do not track best practices and the law. The Office of Inspector General's review of misconduct investigations and</p>  |

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|                  | <p>The Department reports that it agrees with this recommendation and will work to address this issue.</p>   | <p>discipline also revealed important areas, including the definition of false statements and the obligation of employees to cooperate with investigations, where Department supervisors and command staff held differing views on the interpretation of policy, or where written policy was not followed or enforced in practice.</p> |
| <p><b>11</b></p> | <p>Protect the Integrity of the Disciplinary Process:<br/>The Department should develop, implement and adhere to policies which protect the integrity of the Department's internal criminal investigations process and the disciplinary process, including:</p> <ul style="list-style-type: none"> <li>• As permissible by law, make public the transcripts of the disciplinary hearing in matters which involve law enforcement interaction with the public</li> <li>• Identify and discipline those department members who make false statements as described in recommendation six above in social media or other forums regarding the disciplinary process and outcomes.</li> </ul> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> <p>The Department reports that it will follow County Counsel advice on release of transcripts.</p> | <p>The Department's disciplinary process, policies, procedures, and practices do not always track best practices and the law and secrecy of discipline erodes public trust.</p>  |

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| <p><b>12</b></p> | <p>Adequately staff the Internal Affairs Bureau so that the investigations can be completed in a timely manner.</p> <p>2023 Update: According to data provided by the Department, caseloads for IAB investigators have increased nearly 20% since this recommendation was made.</p> <p><b>Recommendation Implemented:</b><br/>Not Implemented</p>  | <p>Internal Affairs Bureau consistently failed to meet internal deadlines for completing investigations, compromising the availability of evidence and the deliberative process involved in adjudicating serious cases.</p> |
| <p><b>13</b></p> | <p>Conduct regular audits of the Internal Affairs Bureau efficiency.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>   | <p>The Office of Inspector General identified several cases where there were lengthy delays in commencement and completion of administrative investigations.</p>  |
| <p><b>14</b></p> | <p>Provide appropriate training to Internal Affairs Bureau investigators in order to address deficiencies such as: failure to follow the evidence and properly document findings, proper interviewing techniques, ignoring inculpatory evidence, failure to search for documentary evidence including video and audio tapes.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> | <p>The Office of Inspector General identified several instances of materially incomplete administrative investigations.</p>   |
| <p><b>15</b></p> | <p>Minimize the role of legal and non-legal representatives in the process to that required by law:<br/>For example, representatives should not be allowed to control the interviews, answer for the employee, reframe questions and control the scheduling of the interview.<br/>Employees are rightfully entitled to a</p>   | <p>The Sheriff's Department permits extensive involvement by employee representatives in the administrative investigation process which effects the quality and integrity of those investigations.</p>                      |

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|    | <p>representative but should not be allowed to unnecessarily delay the interview process to accommodate a specific representatives schedule.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>  |  |
| 16 | <p>Immediately begin Internal Affairs Bureau investigations and not wait for the completed criminal investigation.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>  | <p>An administrative investigation does not commence until the criminal investigation is resolved which results in lengthy delays that compromise the integrity of the administrative investigation process.</p>   |
| 17 | <p>The Department executive staff should fully understand the practical application of the Gates-Johnson agreement which would serve to expedite the Internal Affairs Bureau investigations.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>  | <p>The Department misapplies the Gates-Johnson settlement agreement by refusing to conduct concurrent criminal and administrative investigations.</p>  |
| 18 | <p>Internal Affairs Bureau investigation reports should always have a section regarding "other related issues discovered."</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented</p> <p>In March 2022, IAB adopted Unit Order #21, which requires that, "[i]f during the course of an administrative investigation or Use of Force and/or Shooting Review case, noncriminal misconduct in violation of Department policy is discovered which is unrelated to the investigation at hand, that</p> | <p>The Office of Inspector General found multiple administrative investigation cases where substantial evidence established that persons other than the subject of the investigation had engaged in the same or other misconduct. However, those additional employees were never investigated nor disciplined.</p> |



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|                  | <p>information shall be immediately reported to the responsible unit commander and operations lieutenant... Initial notification of potential noncriminal misconduct can be conducted verbally, however, must be followed by formal notification via memorandum." The Unit Order addresses the core concern underlying this recommendation by requiring IAB to clearly identify to the relevant unit commander any additional misconduct uncovered during the course of an investigation.</p>   |   |
| <p><b>19</b></p> | <p>The County should work with the employee collective bargaining units representing Sheriff's Department employees to:</p> <ul style="list-style-type: none"> <li>• Develop, implement, and ensure adherence to policies that do not delay, interfere or obstruct internal and administrative investigations or corrupt the evidence or statements obtained in internal and administrative investigations.</li> <li>• Ensure that representatives' involvement in the investigative/scheduling process does not extend beyond that required by that required by the Public Safety Officer's Bill of Rights.</li> </ul> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> <p>The Department reports that it agrees with this recommendation and will work with labor organizations on this issue.</p> | <p>The role ceded to unions by the Department in scheduling the time and location of witness interviews had resulted in length delays, including numerous administrative and force-review investigations in which months elapsed between the Department's request for a witness-employee or subject interview and the actual interview.</p> |

**FOURTH REPORT BACK ON IMPLEMENTING BODY-WORN CAMERAS  
IN LOS ANGELES COUNTY  
Published March 2021**

| RECOMMENDATION  | ORIGINAL ISSUE  |
|---|---|
| <p><b>1</b> There should be provisions in the Service Audit Policy for random audits to ensure that deputies are not engaging in inaccurate reporting or biased policing.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering body-worn cameras were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff’s Department.</p> | <p>The Sheriff’s Department’s proposed Service Audit Policy does not provide for independent audits. The proposed policy is at odds with the Sheriff Department’s Body-Worn Camera Policy (MPP3-06/200.53), which states that “Recordings shall not routinely or randomly be reviewed for policy violations where no independent evidence of a policy violation exists.</p> |
| <p><b>2</b> The MPP policy prohibiting random checks for policy violations should be modified to allow random audits and searches for policy violations.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering body-worn cameras were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff’s Department.</p>                  | <p>The proposed Service Audit policy is at odds with the Sheriff’s Department’s Body-Worn Camera Policy (MPP 3-06/200.53) which states that “Recordings shall not be routinely or randomly reviewed for policy violations where no independent allegation or evidence of a policy violation exists.”</p>  |
| <p><b>3</b> Misconduct appearing on video recordings should be investigated and appropriate action taken. The policy</p>  | <p>MPP 3-06/200.58 provides for limiting the disciplinary consequences of misconduct</p>  |

| RECOMMENDATION  | ORIGINAL ISSUE   |
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| <p>should be modified to incorporate accountability and a range of consequences for misconduct.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering body-worn cameras were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> | <p>discovered in a review of body-worn camera video.</p>   |
| <p><b>4</b> The Sheriff's Department policy should incorporate and include that the Office of Inspector General has the right to audit body-worn camera videos and that any requested body-worn camera video be provided.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented, the Office of Inspector General has access to LASD's evidence.com, the system that stores all body-worn camera video.</p>   | <p>The Sheriff's Department proposed Service Audit policy does not include access for the Office of Inspector General. Los Angeles County Code section 6.44.190 requires that the video be provided to the Office of Inspector General upon request; Government Code section 25303.7 requires that it be provided in response to a subpoena.</p> |
| <p><b>5</b> The Sheriff's Department should implement audits regarding compliance with activation policies and should implement policies for discipline for the failure to activate cameras.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering body-worn cameras were presented to the Office of Inspector General in December 2023 but have</p>   | <p>The proposed Service Audit policy does not provide for independent audits. There are no specific sections in the Guidelines for Discipline pertaining to body-worn cameras.</p>   |

| RECOMMENDATION  | ORIGINAL ISSUE   |
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| <p>not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> <p>The Sheriff's Department reports that there is a BWC activation tool that the Department is using to monitor activation issues and reports that AAB conducted an audit of the West Hollywood station in August 2023 and will conduct an audit of Lakewood Station in January 2024. Per the Department, station Watch Commanders and Watch Sergeants are mandated to conduct two audits per shift, totaling twelve audits per day for each station. AAB is also conducting audits in Antelope Valley.</p>   |  |
| <p><b>6</b> The Office of Inspector General recommends that training address the culture among some in the Sheriff's Department that suggests a reluctance to allow the public to film deputies in the performance of their duties.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>After the settlement of a lawsuit involving reporter Josie Huang, the Sheriff's Department re-briefed all staff on MPP Section 3-01/080.16 covering the Department's policy on Photograph, Audio, and Videotaping by the Public and Press and re-briefed all staff on MPP 5-04/020.30 covering the seizure of photographs, video and audio recordings, cameras, recording equipment, and telephones without a warrant. It is unknown whether</p> | <p>Videos posted on the internet by civilians and the media show deputies actively trying to prevent capturing deputies' actions on video.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE |
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| <p>formalized training is offered.</p> <p>The Sheriff’s Department reports that it produced a training video, available on the LASD video hub, that instructs department members on the public’s right to video employees. FOSS Newsletter Volume 14, No. 7 was distributed and provides guidance and re-instructs on MPP Section 3-01/080.16.</p> |                |

**REFORM AND OVERSIGHT EFFORTS: LOS ANGELES COUNTY  
SHERIFF’S DEPARTMENT JANUARY TO MARCH 2021  
Published May 2021**

| RECOMMENDATION  | ORIGINAL ISSUE  |
|---|---|
| <p><b>1</b> Ensure compliance with Penal Code section 830.10.</p> <p><b>Recommendation Implemented:</b><br/>Partially implemented; Custody Division Services issued Unit Order 3-16-022 authorizing use of unique identifying numbers in a manner that complies with Penal Code section 830.10. This unit order applies only to Custody Division Services and not to any other division.<br/>2023 update:<br/>The Sheriff’s Department notes that employees are required to comply with Penal Code section 830.10 and MPP sections 3-03/070.15 and 3-03/340.01. While the Custody Division Services Unit Order briefed compliance with the law and policy, it is not known whether the Department re-briefed other Department members on the policy after this recommendation was made.</p> | <p>In November 2020 allegations surfaced in social and news media that Sheriff’s Department Deputies were covering the cloth name tags on their uniforms or covering their employee numbers during some interactions with the public. The covering of a deputy’s name without wearing a badge or some other identification is a violation of Penal Code section 830.10.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE  |
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| <p><b>2</b> The Sheriff’s Department should enroll in Active Bystander Law Enforcement Training (ABLE).</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>The Department reports it elected to pursue assistance from the COPS Office CRI-TAC program and pursue an alternative training program that is similar to ABLE. Take Action: Make the RIGHT Choice and Intervene is a training program that encourages, empowers, and trains law enforcement personnel to actively intervene when needed to prevent colleagues from committing policy violations, being unprofessional, unethical or being involved in criminal conduct. It is unknown when this program will be implemented.</p> | <p>ABLE is a national peer intervention training program that teaches law enforcement agencies strategies and tactics and provides practical steps to ensure all employees know how to engage in peer intervention. This program emphasizes changing the culture of a law enforcement agency from the top down and teaches officers how to intervene to stop a wrongful action before it occurs. In October of 2020, the Office of Inspector General recommended to a member of the Sheriff’s Department command staff that the Sheriff’s Department enroll in the ABLE training program. Data shows peer intervention can save lives and help communities.</p> |

**REPORT BACK ON PROTECTING SURVIVING FAMILIES FROM LAW ENFORCEMENT HARASSMENT AND RETALIATION**  
**Published July 2021**

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p><b>1</b> Provide the Office of Inspector General with independent access to PRMS.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>2023 Update<br/>OIG access to PRMS has been restored. OIG does not know if some files are marked as IAB Private such that OIG is unable to view such files.</p> | <p>The Office of Inspector General is unable to independently verify complaints or to conduct a meaningful analysis of the complaints for harassment without access to PRMS.</p> |

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p><b>2</b> Provide the Office of Inspector General access to body-worn camera video.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented</p>  |  |
| <p><b>3</b> All complaints of harassment should be forwarded to the Office of Inspector General to monitor and investigate.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering Watch Commander Service Report (the protocol for filing and tracking complaints to the Sheriff's Department) and a handbook for Watch Commander Service Comment Reports (WCSCR) were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.<br/>While the Department reports that OIG has access to all WCSCRs, notifications of harassment complaints are not sent to OIG.</p> | <p>The Office of Inspector General's receipt and retention of complaints allows the Office of Inspector General to decide whether to investigate, analyze, and recommend policy changes to address the systemic issues that allow the misconduct of individual deputies to go unchecked.</p>   |
| <p><b>4</b> Implement the Office of Inspector General's Previous recommendations from its November 17, 2020, report that the Sheriff's Department adopt a policy regarding memorial vigils; ensure thorough investigations of complaints, and ensure complaints are properly classified.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>  | <p>Complaints by families that they are being harassed by Sheriff's deputies continued following the Office of Inspector General's November 2020 <a href="#"><u>Report Back to the Civilian Oversight Commission on Allegations of Harassment Families by LASD Patrol Operations Staff Following a Fatal Use of Force by LASD.</u></a></p> |

| RECOMMENDATION   | ORIGINAL ISSUE |
|--|----------------|
| <p>2023 Update:<br/>A proposed Memorial Vigils policy was presented to the Office of Inspector General in December 2023 but has not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> |                |

**REFORM AND OVERSIGHT EFFORTS: LOS ANGELES COUNTY  
SHERIFF'S DEPARTMENT APRIL TO JUNE 2021  
Published August 2021**

| RECOMMENDATION   | ORIGINAL ISSUE  |
|--|---|
| <p><b>1</b> The Sheriff's Department should update policies to reflect the U.S. District Court's order on projectiles at protests because it was ordered and because the court order reflects best practices even if the preliminary injunction does not become permanent.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>2023 update:<br/>The Sheriff's Department reports that after Assembly Bill 48 (California Penal Code section 13652), which enacts restrictions on the types of force law enforcement can use in response to protests, was signed into law in September 2021, MPP 5-06/030.12 was updated and is compliant with Penal Code section 13652. As a general rule, the bill prohibits the use of "kinetic energy projectiles" (such as rubber or plastic bullets, or "beanbag" rounds) and "chemical agents" (such as tear gas, pepper balls, and pepper spray) to disperse any assembly, protest, or</p> | <p>On May 28, 2021, U.S. District Court Judge Dolly M. Gee, found that the plaintiffs in a lawsuit against the Sheriff's Department seeking to bar deputies from using projectiles at protests submitted "overwhelming evidence" that at five demonstrations in August and September of 2020, deputies used force on protesters, observers and journalists who were not committing any crime, with the exception of failing to follow two dispersal orders. The judge issued a preliminary injunction that ordered the Sheriff's Department to stop using foam rounds, pepper balls, tear gas, cannisters, flash bang grenades, and stringer grenades against peaceful protesters. While a Sheriff's Department newsletter disseminated the order to personnel, as of the report date, no policies were</p> |



| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p>demonstration, except in compliance with certain specified conditions.</p>   | <p>implemented to comply with the court order.</p>   |
| <p><b>2</b> The Sheriff’s Department should update its Guidelines for Discipline to set for the range of punishment for failure to comply with use of projectiles policies against peaceful protesters.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>   | <p>The Sheriff’s Department should draft policies for deputies to follow and its Guidelines for Discipline must be updated to specify the range of punishment for failure to comply with the new policy.</p>   |
| <p><b>3</b> The Sheriff’s Department Homicide investigators should treat Death Reviews as confidential discussions and disclose all facts and details necessary to support a thorough critical incident analysis and provide CHS executives with the same information as CSD executives prior to each Death Review.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> | <p>The purpose of Custody Services Division Administrative Death Reviews (Death Review) is to identify any lapses in care or any conditions or systemic issues that may have contributed to the passing of a person in custody. As part of each Death Review analysis, Sheriff’s Department Homicide Bureau investigators provide observations from the scene of each death, preliminary autopsy findings, and details learned within the first seven days of an investigation. The information provided by the Homicide investigators is often critical for CSD and Correctional Health Services (CHS) in identifying deficiencies and guiding the analysis toward appropriate corrective action. While Homicide investigators may at time appropriately limited disclosure of some investigative details, Homicide’s sometimes</p> |

| RECOMMENDATION | ORIGINAL ISSUE  |
|----------------|---|
|                | conservative approach in sharing the details may impede the Death Review analysis and hinder the greater goal of correcting deficiencies and preventing future tragedies. |

**REVIEW OF AUGUST 7, 2020, SANTA CLARITA INCIDENT**  
**Published September 2021**

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p><b>1</b> The Sheriff’s Department should revise its policy to make the unholstering and pointing of a firearm a reportable use of force, with requirement for routine monitoring and auditing consistent with the monitoring and auditing of other uses of force.</p> <p><b>Recommendation Implemented:</b><br/> Not implemented; as of November 7, 2017, the California Racial and Identity Profiling Act of 2015 (RIPA) requires the Sheriff’s Department to report to the state when a deputy pointed a firearm at a person. (California Code of Regulations 999.226 subdivision (a)12(A)(8).<br/> 2023 update:<br/> The Sheriff’s Department reports that beginning January 2024 data tracking will include the unholstering of a firearm.</p> | Deputies deployed handguns and an AR-15 rifle and pointed them at three teenagers. This did not constitute “force,” as defined by the LASD’s Manual of Policies and Procedures was used. The deputies, therefore, did not need to write a report or document what happened in this incident. The incident was captured on video. |

| RECOMMENDATION  | ORIGINAL ISSUE  |
|---|---|
| <p><b>2</b> The Sheriff's Department's should revise its patrol rifle policy to include clear guidance as to the proper and improper deployment of a rifle. All deputies should undergo training consistent with any policy revisions.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>MPP 5-09-170.00 was revised and became effective on January 18, 2022.</p>   | <p>The MPP makes no mention as to circumstances in which it would be proper or improper to deploy a rifle, leaving the discretion solely to the deputies. High level managers in the Sheriff's Department have also expressed concern at the open-ended and vague direction provided by the MPP.</p>  |
| <p><b>3</b> The Sheriff's Department should diligently document and investigate citizen complaints. A report that is critical of deputy conduct or suggests that conduct fell below the reporting party's expectations should be considered a complaint regardless of whether the reporting party designates it as a complaint. Treating all such service reports as complaints ensures that there will be a record of the conduct and an investigation.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering Watch Commander Service Report (the protocol for filing and tracking complaints to the Sheriff's Department) and a handbook for Watch Commander Service Comment Reports (WCSCR) were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> <p>The Sheriff's Department reports that</p> | <p>In this incident that is the subject matter of this report, the crowd of onlookers, members of the public on social media, and community leaders all expressed concerns regarding the behavior of the involved deputies, but these concerns were not documented because they did not complain directly to the station or expressly state they wanted to file a complaint. Even in the absence of receiving an express public complaint, in situations such as this one, which received media coverage and scrutiny, supervisors and managers should have investigated the deputies' tactics to ensure they were sound.</p> |

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p>it now has available multiple methods for complaint submission including online, at a station, and a 24/7 telephone number.</p>  |  |
| <p><b>4</b> Allegations of racial bias should be investigated when race is mentioned.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering Watch Commander Service Report (the protocol for filing and tracking complaints to the Sheriff's Department) and a handbook for Watch Commander Service Comment Reports (WCSCR) were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> <p>The Sheriff's Department notes that MMP Sections 3-01/000.05 (Bias-Free Policing), has a section specifically on Complaints, and the Service Comment Report Form. The policy also states that: "Complaints of racial bias must be noted on the WCSCR form." Two other policies in place address WCSCRs: MPP 3-01/122.20 (Policy of Equity-Procedures-External Complaint Monitoring)and MPP 3-04/010.05 (Procedures for Department Service Reviews)</p> | <p>The one documented complaint, stated that people of color, such as the young males in this incident, are treated differently by law enforcement. The complainant did not state in exact words he believed the deputies were discriminating based on race, but it is clear his complaint included a complaint of discrimination. Also, on the video posted to social media, the videographer made statements suggesting race may have played a factor in the deputies' actions. The Sheriff's Department did not investigate if implicit or explicit bias may have played a role in the deputies' actions.</p> |

| RECOMMENDATION  | ORIGINAL ISSUE  |
|---|---|
| <p><b>5</b> The Sheriff’s Department must ensure that personnel receiving complaints do not dissuade complainants or comment in a way that might be interpreted as minimizing the comments or discouraging the making of the complaint.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering Watch Commander Service Report (the protocol for filing and tracking complaints to the Sheriff’s Department) and a handbook for Watch Commander Service Comment Reports (WCSCR) were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff’s Department.</p> | <p>Even when the complainant stated the words, “I want to make a complaint,” the LASD representative’s response is troubling. In this incident, a lieutenant, a person in a management role, challenged the complainant’s knowledge of the incident; questioned the complainant as to whether he had law enforcement training, and disagreed with well-established data that minorities are disproportionately “pressed on in situations like this.”</p>              |
| <p><b>6</b> The Sheriff’s Department should insist upon compliance with its Manual of Policy and Procedures; personnel directly involved in an incident should not conduct any subsequent inquiry or investigation about that incident.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering Watch Commander Service Report (the protocol for filing and tracking complaints to the Sheriff’s Department) and a handbook for Watch Commander Service Comment</p>  | <p>The Watch Commander assigned to investigate the complaint was the on-duty watch commander when this incident occurred. In an audio recording of a conversation that took place during the incident, the Watch Commander can be heard calling from the station and speaking to the field deputies. The Watch Commander voiced concerns that the deputies were not updating him as to what was happening in the field. This same Watch Commander was assigned to</p> |

| RECOMMENDATION  | ORIGINAL ISSUE  |
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| <p>Reports (WCSCR) were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p>   | <p>investigate whether the deputies' actions and conduct were justified. There is an inherent conflict of having a supervisor who oversaw an incident being assigned to investigate. Whether his/her employees acted properly under his/her direction during the incident.</p>  |
| <p><b>7</b> Efforts should be made to document favorable comments and unfavorable comments about the Sheriff's Department to provide an impartial assessment of facts and evidence.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering Watch Commander Service Report (the protocol for filing and tracking complaints to the Sheriff's Department) and a handbook for Watch Commander Service Comment Reports (WCSCR) were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> | <p>The Sheriff's Department appears reluctant to receive public complaints. The same, however, cannot be said of commendations. Office of Inspector General representatives have attended meetings during which LASD management have repeatedly asked supervisors to go out of their way to document commendations and compliments no matter how they come in or are heard. As eager as LASD is to document commendations, it must have the same attitude with public complaints.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE  |
|--|---|
| <p><b>8</b> The Sheriff’s Department should audio and/or video record all interviews, including interviews of Sheriff’s Department personnel.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering Watch Commander Service Report (the protocol for filing and tracking complaints to the Sheriff’s Department) and a handbook for Watch Commander Service Comment Reports (WCSCR) were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff’s Department.</p> <p>The Sheriff’s Department reports that this recommendation is under consideration.</p> | <p>The investigation of the complaint, which the Sheriff’s Department refers to as a Watch Commander Service Comment Report (WCSCR) includes audio recordings of all the witness interviews, except for the deputies involved. Even the initial August 7th calls for service to the station and the complainant’s conversation to file the complaint were recorded. Given the capability to record interviews, it is unclear why they chose not to record any of the statements of the 15 deputies interviewed.</p> |
| <p><b>9</b> When documenting an investigation, the background of the involved parties should include only relevant information. If a deputy was unaware of a party’s background during an incident, it generally has no bearing on a deputy’s conduct.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff’s Department reports that this recommendation is under consideration.</p>  | <p>On several occasions, the Office of Inspector General has noted that Sheriff’s Department representatives provided a detailed description of a suspect or subject’s background– a background which a responding officer was usually unaware of at the time of the incident. There is no reason to detail a subject’s past contacts with law enforcement, except to muddy the subject’s character and/or to garner sympathy for the deputies’ actions.</p>  |

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p><b>10</b> Labeling the parties to an incident as a suspect or a witness should not be done until the completion of the investigation.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff’s Department reports that this recommendation is under consideration but notes that proposed revisions in the use-of-force and Taser policies use the word subject in place of suspect in order to ensure that the policy on investigations is neutral at the outset.</p> | <p>The Sheriff’s Department should wait to label involved individuals as suspects or victims until a thorough investigation has been completed and all available parties are questioned. Pre-judging the guilt or innocence of the involved parties can lead to biased questioning and/or investigation.</p> |

**FIFTH REPORT BACK ON IMPLEMENTING BODY-WORN CAMERAS IN LOS ANGELES COUNTY**  
**Published September 2021**

| RECOMMENDATION   | ORIGINAL ISSUE   |
|--|--|
| <p><b>1</b> Deputies should not view video that captured a use of force regardless of the category of force used, prior to authoring their reports on the incident.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering body-worn cameras were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff’s Department.</p> <p>The Sheriff’s Department reports that it will consider this recommendation.</p> | <p>Per the Sheriff’s Department MPP 3-06/200.55, deputies are not permitted to view BWC video in Category 3 uses of force incidents, without prior authorization from the handling Homicide lieutenant or the Internal Affairs Bureau. In lesser uses of force, deputies are encouraged to view the video prior to authoring their report. The Office of Inspector General is concerned with deputies’ abilities to view videos prior to authoring their reports, specifically in situations where deputies use force.</p> |



| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p><b>2</b> The Office of Inspector General should have unfettered viewing access to all BWC video through Evidence.com</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented</p>  | <p>Without access to BWC video, the Office of Inspector General does not have sufficient access to investigate, audit, or monitor Sheriff's Department operations, including adherence by deputies to the Department's policies and state and federal laws.</p>  |
| <p><b>3</b> The Sheriff's Department should have a blanket policy that BWCs should be turned on for any contact with a civilian, not only for investigative or enforcement contacts.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering body-worn cameras were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> <p>The Sheriff's Department reports it is open to discussion on this recommendation.</p> | <p>In several force/shooting incidents, the Office of Inspector General noted deputy personnel had delays in activating their cameras. There are also instances in which a deputy has activated the camera and turned it off prior to the completion of the call and instances in which the BWC fails to capture the entirety of the incident because the deputy on scene is not assigned as the primary deputy.</p> |
| <p><b>4</b> The Sheriff's Department should change its policy on deputies' discretion in activating the camera as stated in the Manual of Policies and Procedures section 3-06/200.08. Instead, the Department should require deputies to activate the cameras when responding to any call for service or at the initiation of any civilian contacts or other law enforcement duties, and require the cameras not be de-activated until the</p>   | <p>In several force/shooting incidents, the Office of Inspector General noted deputy personnel had delays in activating their cameras. There are also instances in which a deputy has activated the camera and turned it off prior to the completion of the call and instances in which the BWC fails to capture the entirety of the incident</p>  |

| RECOMMENDATION  | ORIGINAL ISSUE  |
|---|---|
| <p>termination of the call for service or contact.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> <p>2023 Update:<br/>Proposed revisions to policies covering body-worn cameras were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff's Department.</p> | <p>because the deputy on scene is not assigned as the primary deputy.</p> |

**REFORM AND OVERSIGHT EFFORTS: LOS ANGELES COUNTY  
SHERIFF'S DEPARTMENT JULY TO SEPTEMBER 2021  
Published December 2021**

| RECOMMENDATION   | ORIGINAL ISSUE  |
|--|---|
| <p><b>1</b> The Sheriff's Department should consider enacting a policy prohibiting employees who meet or interact with members of the public on-duty, or in uniform, from initiating or cultivating personal relationships including but not limited to romantic, sexual, business, financial, or political relationships. This policy should include all members of the public including, but not limited to, victims, witnesses, and suspects.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> | <p>There is an inherent conflict that exists when a Sheriff's Department employee attempts to initiate a relationship with a member of the public that begins with on-duty or in uniform contacts. Examples of conduct by deputies, evidence that initiating and forming relationships with members of the public while on-duty may cause the person with whom the relationship is sought to believe that there may be consequences for not complying with the Sheriff Department employee's demands. In other words, that the deputy is acting under the color of authority in pursuing the personal relationship. The</p> |

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
|   | <p>Sheriff's Department has not created any policies that clearly state such initiation and cultivation of relationships with members of the public who they encounter during the course of their duties are strictly prohibited.</p>          |
| <p><b>2</b> The Sheriff's Department should enact a policy prohibiting engaging in on-duty sexual activity.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>   | <p>Examples provided in the report include instances of on-duty sexual activity.</p>   |
| <p><b>3</b> The Sheriff's Department should reduce its population to 12,404, which is the jail system capacity rated by the Board of State and Community Corrections (BSCC) and work with the County justice partners to conduct an analysis of the current jail population based on charges, criminal procedural status, and other categories as appropriate to determine which people in the custody the Sheriff possesses the legal authority to release unilaterally.</p> <p><b>Recommendation Implemented:</b><br/>Partially implemented<br/>2023 Update:<br/>The Sheriff's Department reported that the overall population is now below 12,404. The rated capacity of the jails is based on the aggregate of the rated capacity for each <b>rated</b> facility and not all facilities have a BSCC rated capacity. For instance, the Inmate Reception Center and some medical beds are not included in the aggregate because the BSCC doesn't rate the capacity for those areas. As of the writing of this report,</p> | <p>On October 15, 2021, there were 31 pregnant people in Sheriff's Department custody who were ineligible for release. Additionally, overcrowding, inadequate housing availability, and poor conditions of confinement exist in the jails.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE |
|--|----------------|
| <p>the population in some facilities is over the BSCC rated capacity. The Sheriff’s Department failed to note this in reporting to OIG that the population is lower than the rated capacity. On January 31, 2024, MCJ was 51 persons over capacity, NCCF was 600 persons over capacity, and PDC-North was 257 persons over capacity. Recent historical data shows that on January 17, 2024, MCJ was 78 persons over capacity, NCCF was 502 persons over capacity, and PDC-North was 253 persons over capacity; on December 31, 2023, MCJ was 13 persons over capacity, NCCF was 502 persons over capacity, and PDC-North was 292 persons over capacity.</p> <p>The overall population has risen since the end of 2023. Additionally, staffing shortages continue to cause poor conditions of confinement that fall short of constitutional requirements.</p> |                |

## 2022 Reports<sup>5</sup>

| 2022 Recommendations |       |
|----------------------|-------|
| Status               | Total |
| Implemented          | 4     |
| Not Implemented      | 24    |

<sup>5</sup> This report card has three more reports for the year 2022 than the 2022 report card, which only had reports through October of that year. Three of the recommendations from the 2022 report card were adopted by this administration, as was one of the recommendations in the newly added reports.

**REFORM AND OVERSIGHT EFFORTS: LOS ANGELES COUNTY  
SHERIFF'S DEPARTMENT OCTOBER TO DECEMBER 2021  
Published February 2022**

| RECOMMENDATION   | ORIGINAL ISSUE   |
|--|--|
| <p><b>1</b> The Sheriff's Department should determine its authority to release people in custody, specifically pregnant people given the barriers in meeting the nutritional and exercise needs of incarcerated pregnant people.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff's Department reports that the pregnant people who remain in custody are ineligible for release. Other than the Court implemented zero bail schedule, no changes to the Sheriff's Department's release policies have been made. The Sheriff's Department reports that they meet the nutritional needs of pregnant persons in custody, comply with exercise time requirements, and implemented a tracking system to monitor additional exercise time. Through interviews of pregnant persons in custody, OIG was able to confirm that special prenatal diets and bottled water are being supplied as reported. The Department reports revising CRDF Unit Order #5-23-090 to reflect the addition of 45 minutes of large muscle exercise time for pregnant people in custody. However, several pregnant persons reported a lack of access to large muscle exercise for those housed in mental health units, that at times they must request a walk, and that there is a denial of exercise time due to quarantine or lack of available staff to accompany them to the outdoor area.</p> | <p>The nutritional and exercise needs of pregnant people in custody are not being met.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE  |
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| <p>In the FIP Stepdown unit, the two pregnant people are required to walk in a small space inside the pod for exercise and do not have access to daily outdoor exercise. OIG determined custody staff do not consistently document the additional exercise time in the eUDAL. During the fourth quarter of 2023, only 65% of modules that house pregnant people in custody documented offering time for large muscle exercise. According to the Sheriff's Department, Unit Order #5-23-090 is under review for possible modifications to reflect existing circumstances to pregnant people in custody. CRDF has an assigned sergeant with the collateral duty of overseeing compliance with requirements for pregnant people in custody. A request was made by CRDF staff to change the eUDAL system to document additional items provided to pregnant persons in custody.</p> |   |
| <p><b>2</b> The Sheriff's Department should hold personnel accountable through its progressive discipline system when personnel fail to comply with leadership directives for out of cell time for incarcerated pregnant people.</p> <p><b>Recommendation Implemented:</b><br/> Not implemented<br/> 2023 update:<br/> CRDF's Unit Order #5-23-090 states, "Module personnel shall offer pregnant inmates additional out-of-cell time for large muscle exercise. This will consist of forty-five minutes of walking each day. Module officers shall document this offering in</p>  | <p>The exercise time for incarcerated pregnant people is not being met.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE  |
|--|---|
| <p>the e-UDAL in the additional information section" and should include identifying information. However, OIG staff randomly reviewed several modules that house pregnant people and discovered that this unit order is not consistently followed in any module. In addition, the Sheriff's Department has not held personnel accountable through its progressive discipline system when personnel fail to comply with this unit order. Furthermore, pregnant people continue to report to the OIG that they must ask for out of cell time for exercise or are denied access due to staffing deficiencies.</p> <p>According to the Sheriff's Department, Unit Order #5-23-090 is under review for possible modifications to reflect existing circumstances to pregnant people in custody.</p> <p>CRDF has an assigned sergeant with the collateral duty of overseeing compliance with requirements for pregnant people in custody.</p> |   |
| <p><b>3</b> If failures to comply with directives regarding out of cell time for incarcerated pregnant people are due to systemic or operational deficiencies, the Sheriff's Department should identify and remedy such deficiencies.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Department reports revising CRDF Unit Order #5-23-090 to reflect the addition of 45 minutes of large muscle exercise time for incarcerated persons and notes that this assists</p>  | <p>The exercise time for incarcerated pregnant people is not being met.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE |
|--|----------------|
| <p>management in holding personnel accountable through progressive discipline. Training for newly hired personnel is scheduled to cover exercise time for incarcerated pregnant persons.</p> |                |

**REVIEW OF A DEPUTY-INVOLVED SHOOTING WITHOUT AN ADMINISTRATIVE INVESTIGATION**  
**Published April 2022**

| RECOMMENDATION  | ORIGINAL ISSUE  |
|---|---|
| <p><b>1</b> The Sheriff’s Department should conduct concurrent investigations, by the Homicide Bureau (criminally) and by the Internal Affairs Bureau (administratively) after a deputy-involved shooting has occurred.</p> <p><b>Recommendation Implemented:</b><br/> Not implemented<br/> 2023 update:<br/> The Sheriff Department reports that Sheriff Luna has directed that parallel investigations take place. The Sheriff’s Department has not reported how many, if any, parallel investigations are in progress.</p> | <p>The Sheriff’s Department Executive Force Review Committee reviewed a deputy-involved shooting that had been investigated criminally by the Homicide Bureau but not administratively by the Internal Affairs Bureau, leaving many unanswered questions as to the circumstances and communication that led to the deputies to respond to the scene, which quickly escalated into a deputy-involved shooting.</p> |
| <p><b>2</b> The Executive Force Review Committee and the Case Review proceedings should be held only after both the Homicide Bureau and Internal Affairs Bureau investigations are completed so that the committees have the benefit of making decisions based upon all available information gathered.</p> <p><b>Recommendation Implemented:</b><br/> Not implemented</p>  | <p>The deputy-involved shooting of Ryan Twyman was heard by the Executive Force Review Committee and the Case Review panel without an administrative investigation.</p>   |



| RECOMMENDATION  | ORIGINAL ISSUE  |
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| <p><b>3</b> The Sheriff’s Department executive staff should consult with County Counsel in order to fully understand the practical application of the Gates-Johnson agreement, which would serve to expedite Internal Affairs Bureau investigations.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff Department reports that Sheriff Luna has directed that parallel investigations take place. The Sheriff’s Department has not reported how many, if any, parallel investigations are in progress.</p> | <p>The Department cites the Gates-Johnson agreement as the reason for conducting consecutive investigations but nothing in the agreement or the court’s decision prevents concurrent investigations. The agreement restricts only the timing of a compelled administrative interrogation of a deputy concurrently subject to a criminal investigation.</p>  |
| <p><b>4</b> The Sheriff’s Department should re-negotiate the Gates-Johnson agreement.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>   | <p>The practice of conducting consecutive, rather than concurrent, criminal, and administrative investigations is no longer followed by many law enforcement agencies, as it deprives law enforcement of crucial and timely information that might be lost with the passage of time. Procedural safeguards can be implemented to guard against the use in the criminal case of involuntary statements. There have been significant changes in circumstances since the unpublished opinion upholding the Gates-Johnson agreement was issued in November 2013. These include the establishment of the Office of Inspector General which has subpoena power. The expenditure of millions of dollars of public funds in lawsuits by survivors of deputy-involved shootings; the amendment to Penal Code</p> |

| RECOMMENDATION | ORIGINAL ISSUE  |
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|                | <p>section 832.7 to strip records of investigations of deputy involved shootings of their confidential status, and the heightened public interest in and concern about shootings of civilians by law enforcement personnel.</p> |

**SIXTH REPORT BACK ON IMPLEMENTING BODY-WORN CAMERAS IN  
 LOS ANGELES COUNTY**  
**Published April 2022**

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p><b>1</b> The Gang Surveillance Unit (GSU) should receive BWCs.</p> <p><b>Recommendation Implemented:</b><br/>           Yes, implemented<br/>           2023 Update:<br/>           Proposed revisions to policies covering body-worn cameras were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff’s Department.</p> | <p>Members of an Operation Safe Streets team were not wearing BWCs while conducting a “surveillance/apprehension” operation of an armed suspect who was allegedly involved in a recent carjacking. A deputy-involved shooting occurred that was not captured on body-worn camera due to the lack of deployment of the cameras during this operation. A civilian was killed in the incident, and it was unknown whether it was a deputy’s bullet that resulted in the fatality. Members of units that interact with the public, investigate criminal activity, and effectuate arrests should have BWCs to record such interactions.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE   |
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| <p><b>2</b> Undercover surveillance operations should have an appropriate tactical plan that includes having some deputies equipped with BWCs available in the event an encounter with the suspect occurs.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering body-worn cameras were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff’s Department.</p> <p>The Sheriff’s Department reports that Operation Safe Streets Bureau has body-worn cameras and Major Crimes Bureau will have cameras deployed once a new body-worn camera policy is approved.</p> | <p>Members of an Operation Safe Streets team were not wearing BWCs while conducting a “surveillance/apprehension” operation of an armed suspect who was allegedly involved in a recent carjacking. A deputy-involved shooting occurred that was not captured on body-worn camera due to the lack of deployment of the cameras during this operation. A civilian was killed in the incident, and it was unknown whether it was a deputy’s bullet that resulted in the fatality.</p> |
| <p><b>3</b> The Sheriff’s Department should simplify its BWC policy to abrogate the use of exceptions for employing BWCs when contacting suspects or other members of the public.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>Proposed revisions to policies covering body-worn cameras were presented to the Office of Inspector General in December 2023 but have not been adopted; the Office of Inspector General provided comments on the proposed revisions to the policies for consideration by the Sheriff’s Department.</p>  | <p>In several force/shooting incidents, the Office of Inspector General noted deputy personnel had delays in activating their cameras or failing to do so all together.</p>  |

**THE SHERIFF'S DEPARTMENT'S UNDERREPORTING OF CIVILIAN  
STOP DATA TO THE CALIFORNIA ATTORNEY GENERAL**  
**Published June 2022**

| RECOMMENDATION   | ORIGINAL ISSUE  |
|--|---|
| <p><b>1</b> A comprehensive audit of the Computer Aided Dispatch System (CAD) and the Sheriff's Automated Contact Reporting System (SACR) systems from July 2018 to the present identifying all errors within the prior reports should be conducted by a qualified third-party entity. That entity should prepare a report to be submitted to the California Department of Justice noting the errors and documenting accurate data.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff's Department reports that proposals submitted in response to an RFP to replace the CAD systems are being evaluated. The new system will eliminate discrepancies. To comply with revised RIPA requirements for 2024, updated user guides and training are in production.</p> | <p>Pursuant to the Racial and Identity Profiling Act of 2015 (RIPA), the Sheriff's Department is required to report certain data annually, including the perceived race/ethnicity, gender, and approximate age of the people detained, arrested, or searched by Sheriff's Department deputies. An Office of Inspector General audit of the Sheriff's Department CAD and SACR data revealed numerous discrepancies in data reported to the California Department of Justice.</p> |
| <p><b>2</b> To promote transparency and oversight, the Sheriff's Department should make all CAD system data available upon request to the Office of Inspector General.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented<br/>The Sheriff's Department reports that OIG has access except for data restricted by CA-DOJ. OIG is not aware of any state restriction that would prevent OIG from accessing all RIPA data.</p>  | <p>The Sheriff's Department did not provide all the requested data to the Office of Inspector General, thereby limiting the scope of the audit and impacting the Office of the Inspector General's ability to fully capture the breadth of the discrepancies in the data.</p>   |

| RECOMMENDATION  | ORIGINAL ISSUE   |
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| <p><b>3</b> The Sheriff’s Department should develop internal controls that ensure deputies are entering appropriate stop data in both the CAD and SACR systems.<sup>6</sup></p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff’s Department reports that proposals submitted in response to an RFP to replace the CAD systems are being evaluated. The new system will eliminate discrepancies. To comply with revised RIPA requirements for 2024, updated user guides and training are in production.</p>  | <p>The Office of Inspector General discovered that the Sheriff’s Department was improperly coding calls for service and observations, or failing to include some contacts, thereby creating a discrepancy in the data systems.</p> |
| <p><b>4</b> For future reports, the Sheriff’s Department Audits and Accountability Bureau should conduct regular audits to reconcile any data discrepancies between the CAD system and the SACR system and take immediate action to correct any observed discrepancies BEFORE submitting the information to the State of California.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff’s Department reports that proposals submitted in response to an RFP to replace the CAD systems are being evaluated. The new system will eliminate discrepancies. To comply with revised RIPA requirements for 2024, updated user guides and training are in production.</p> | <p>The Sheriff’s Department has routinely submitted inaccurate data to the State of California.</p>  |

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<sup>6</sup> The report sets forth specific technical recommendations that address internal controls necessary to ensure that the data entered is accurately gathered and reported.

| RECOMMENDATION   | ORIGINAL ISSUE   |
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| <p><b>5</b> The Sheriff’s Department should conduct annual trainings at each station on the requirements of RIPA, which should include training on the requirements of Field Operations Directive 18-004 and MPP 5-09/520.25, which provide guidance on the data to be entered into SACR and the trainings should stress the importance of entering the required stop data in both the CAD and SACR systems, with possible discipline for any failures.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff’s Department reports that its SACR program created several tools to ensure that employees are aware of the requirements for RIPA reporting and the Department's data collection requirements. The SACR Intranet page provides access to the Department's policies and procedures and contains three user guides (Deputy User Guide, Approver User Guide, and Station Administrator User Guide). The site also contains a training area for department members to practice using the SACR system. The SACR program also maintains a SACR help desk and has an internal dashboard that tracks compliance with SACR reporting requirements. To comply with revised RIPA requirements for 2024, updated user guides and training are in production.</p> | <p>Deputies routinely fail to accurately capture data from contacts with members of the public in violation of RIPA.</p>                             |
| <p><b>6</b> The Sheriff’s Department should establish a RIPA Compliance Help Desk where deputies in the field can call in to ask questions on what to enter into the databases.</p>  | <p>The Sheriff’s Department has help desks in place to support the use of other computer programs and establishing a RIPA help desk would assist</p> |

| RECOMMENDATION  | ORIGINAL ISSUE  |
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| <p><b>Recommendation Implemented:</b><br/>Partially implemented<br/>The SACR program maintains a SACR help desk and has an internal dashboard that tracks compliance with SACR reporting requirements.</p>  | <p>deputies with questions or issues they have when inputting data into the CAD and SACR systems.</p>   |
| <p><b>7</b> The Sheriff’s Department should develop a concrete fiscal plan to replace the CAD system with a single system for logging civilian contacts to avoid redundant data entry and underreporting of data.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff’s Department reports that proposals submitted in response to an RFP to replace the CAD systems are being evaluated. The new system will eliminate discrepancies.</p> | <p>The Sheriff’s Department is aware of deficiencies within the CAD system impacting their ability to collect RIPA compliance data and has stated that the system cannot be upgraded due to its age and obsolescence.</p> |

**ALLEGATION OF RACIAL DISPARITIES IN CONTACTS WITH HIGH SCHOOL STUDENTS BY THE SHERIFF’S DEPARTMENT’S LANCASTER STATION**

**Published June 2022**

| RECOMMENDATION   | ORIGINAL ISSUE   |
|--|--|
| <p><b>1</b> The Sheriff’s Department should comply with Government Code section 25303.7 and Penal Code section 13510.8(8) and provide unimpeded access to government records and personnel to permit the Office of Inspector General office to discharge its monitoring and investigative duties.</p> <p><b>Recommendation Implemented:</b><br/>Partially implemented<br/>2023 update:<br/>The Sheriff’s Department is</p> | <p>On September 16, 2021, the website <i>LAist</i> published an online news report regarding a video of a School Resource Deputy at Lancaster High body slamming a Black student, MiKayla Robinson. The article also reported that community groups were advocating for the severing of campus security contracts with LASD. Office of Inspector General staff met with the Captain of the Lancaster station regarding the</p> |

| RECOMMENDATION  | ORIGINAL ISSUE   |
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| <p>responsive to most requests for records or information made by OIG.</p>  | <p>use of force on Ms. Robinson and requested information on the incident.</p> <p>Because the information was not provided in a timely manner, the Office of Inspector General was unable to investigate the reason for the deputy's contact with Ms. Robinson or whether the use of force violates Sheriff's Department policies or Ms. Robinson's civil rights.</p>  |
| <p><b>2</b> The Sheriff's Department should provide the Office of Inspector General with viewing access to all body-worn camera videos and amend its audit policy to provide the Office of Inspector General with unrestricted viewing access.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented</p>   | <p>The Sheriff's Department refused to provide OIG with the BWC video from the incident with the student. Without access to BWC video, the Office of Inspector General does not have sufficient access to investigate, audit, or monitor Sheriff's Department operations, including adherence by deputies to the Department's policies and state and federal laws.</p>   |
| <p><b>3</b> The Sheriff's Department should engage in with the County's efforts to shift the paradigm of the youth criminal justice system from a punitive approach to an evidence-based rehabilitative model as set forth in the Board of Supervisor's June 8, 2021, motion entitled "Strengthening Oversight of School Law Enforcement Services."</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 update:<br/>The Sheriff's Department reports that Sheriff Luna is scheduled to meet with</p> | <p>In many instances, the Sheriff's Department deputies are the County's first point of contact with at-risk youth or youth in crisis and should work with stakeholders to improve the safety and well-being of youth on school campuses. Deputies are not provided with enough training to support their roles as informal counselors to youth and to divert qualifying youth away from the criminal process and into wholistic programming aimed at preventing</p> |



| RECOMMENDATION   | ORIGINAL ISSUE   |
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| <p>Department of Youth Development leadership in January 2024.</p>   | <p>involvement in the criminal justice system and recidivism.</p>  |
| <p><b>4</b> The June 8, 2021, "Strengthening Oversight of School Law Enforcement Services Motion also requires a report back by the Chief Executive Officer and the Director of Office of Diversion and Reentry propose a set of quarterly data points. The Sheriff's Department should publish CAD system data on all deputy contacts with students including data points listed in the June 8, 2021, "Strengthening Oversight of School Law Enforcement Services Motion with appropriate privacy redactions.</p> <p>The Sheriff's Department should conduct a quarterly comprehensive audit of data points relating to School Resource Deputy contacts with youth in the CAD system and reconcile those totals with the data reflected in the SACR system to verify SACR system accuracy.</p> <p><b>Recommendation Implemented:</b><br/> Not implemented<br/> 2023 update:<br/> The Sheriff's Department reports that proposals submitted in response to an RFP to replace the CAD systems are being evaluated. The new system will eliminate discrepancies.</p> | <p>Timely access to accurate LASD data is essential for the successful planning and monitoring of the County's Youth Justice reform efforts.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE  |
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| <p><b>5</b> The Sheriff’s Department’s Youth Services Unit (YSU) oversees the School Resource Deputy Program.</p> <p>YSU staffing should be increased to expand the Sheriff’s Department’s ability to coordinate, cooperate, and collaborate with the Board, Civilian Oversight Commission, CBOs, school districts, other County partners, and individual families within the community.</p> <p>In addition to the School Resource Officer program, the YSU oversees all Youth Activity Leagues, the Stop Hate and Respect Everyone (SHARE) Tolerance program, Sheriff Explorer programs, and Vital Interventions and the Directional Alternatives program, throughout Los Angeles County. The Sheriff’s Department should strongly consider allocating a higher percentage of its funding to these programs to maximize their scope and impact.</p> <p><b>Recommendation Implemented:</b><br/> Not implemented<br/> 2023 update:<br/> The Sheriff’s Department reports that Community Partnership Bureau (CPB) is working to collaborate with the recently formed Department of Youth Development (DYD), which includes the County's youth diversion programs. The Captain and Youth Services Lieutenant of the CPB are scheduled to meet with DYD in early January. DYD staff have previously participated in School Resource Deputy (SRD) training and will be invited to present at the two 40-hour training SRD training sessions planned for 2024.</p> | <p>The Sheriff’s Department has effective programs in place that should be expanded and coordinated with the County’s broader Youth Justice reform efforts.</p> |

| RECOMMENDATION  | ORIGINAL ISSUE |
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| <p>The Department agrees that expanding the SRD team represents a pivotal step in fortifying the program's efficacy, allowing for a more strategic allocation of resources to address the multifaceted challenges of the school setting. By augmenting the team, the program can better fulfill its mission of promoting a safe and supportive learning environment. The Sheriff's Department does note that current staffing levels prohibit immediate expansion but that collaborative efforts DYD and the DPH Office of Violence Prevention will contribute greatly to expanding the capabilities of the Department in servicing this program.</p> |                |

**REFORM AND OVERSIGHT EFFORTS: LOS ANGELES COUNTY  
SHERIFF'S DEPARTMENT APRIL TO JUNE 2022  
Published August 2022**

| RECOMMENDATION   | ORIGINAL ISSUE   |
|--|--|
| <p><b>1</b> Sheriff's Department should pursue full implementation of tablets throughout the Custody Services Division (CSD).</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>The Sheriff's Department reports that in order to move forward with this recommendation, a network upgrade is necessary to support the additional technology. A network upgrade proposal was presented to the County's Information Technology Investment Board in December 2023 and will be presented to the Board for final approval. According to the</p> | <p>The Sheriff's Department has not fully implemented the use of tablet computers (tablets) in its jail facilities to capture information related to requests and grievances filed by people in custody.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE |
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| <p>Department, the request has the support of the CEO DOJ compliance team.</p> |                |

**SEVENTH REPORT BACK ON IMPLEMENTING BODY-WORN CAMERAS  
 IN LOS ANGELES COUNTY**  
**Published September 2022**

| RECOMMENDATION   | ORIGINAL ISSUE  |
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| <p><b>1</b> While the Sheriff’s Department has outfitted many of the patrol units with body-worn cameras (BWCs), the Office of Inspector General recommends that specialized units, such as Special Enforcement Bureau and Major Crimes, also receive BWCs.</p> <p><b>Recommendation Implemented:</b><br/>           Not implemented<br/>           2023 Update:<br/>           Some specialized units received body-worn cameras but not all specialized units have them.</p> | <p>Specialized units within the Sheriff’s Department have been involved in uses of force, including deputy involved shootings. Without BWC video, valuable evidence including evidence of whether policies and procedures were followed is lost.</p>  |
| <p><b>2</b> The Office of Inspector General recommends all Sheriff’s Department Personnel to be re-briefed on the technology and Sheriff’s Department BWC policies to ensure all levels of command staff have a robust understanding of how the BWCs work and the policies surrounding the use of the cameras.</p> <p><b>Recommendation Implemented:</b><br/>           Not implemented</p>  | <p>BWCs are continually recording and activating the “record” feature triggers the BWC to <b>save</b> the video, including the minute prior to the record button being activated. During that minute, only the video, but not the audio, is saved. Office of Inspector General representatives have seen several BWC videos where it is clear there was a delay in activation that is contrary to the Sheriff’s Department policy, including after the deputies arrive on the scene or after a shooting occurred. Responses to inquiries from</p> |

| RECOMMENDATION  | ORIGINAL ISSUE  |
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|   | the Office of Inspector General regarding these delays have included answers that suggest the personnel responsible for investigating policy violations are unaware that the one minute captured prior to the audio indicates that the recording was not activated until after that one-minute period, resulting in the Sheriff's Department missing policy violations. |
| <p><b>3</b> The Office of Inspector General recommends that the Sheriff's Department provide the proposed MOU to the Office of Inspector General for analysis and input and then to expeditiously finalize the MOU with the federal government to ensure cameras are quickly deployed to the GSU given that it has been involved in two shootings this year.</p> <p><b>Recommendation Implemented:</b><br/>Yes, implemented</p> | The MOU with the federal government delayed the deployment of BWCs to the GSU.  |

**REFORM AND OVERSIGHT EFFORTS: LOS ANGELES COUNTY  
SHERIFF'S DEPARTMENT JULY TO SEPTEMBER 2022  
Published November 2022**

| RECOMMENDATION   | ORIGINAL ISSUE  |
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| <p><b>1</b> The Office of Inspector General recommends that the Sheriff's Department implement a system that documents reasons for denial of Prison Personnel Office (PPO) participation, documents reasons for elective non-participation, explore ways to promote PPO participation for eligible persons, and explore alternative ways of evaluating</p> | In the final quarter of 2021, the Office of Inspector General received complaints from people in custody and community stakeholders that people in custody at Century Regional Detention Facility (CRDF) were being deprived of participation in credit-earning programming opportunities |

| RECOMMENDATION  | ORIGINAL ISSUE  |
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| <p>persons for PPO to provide equitable opportunity for participation.</p> <p><b>Recommendation Implemented:</b><br/>Partially implemented<br/>2023 Update:<br/>The Sheriff’s Department reports that it is working with software vendors to create efficiencies in PPO screening of potential inmate workers, including documenting jail employment participation denial and elective non-participation.</p> | <p>based on race/ethnicity. In response, the Office of Inspector General completed an analysis of participation in jail employment opportunities at CRDF, which showed inequitable racial/ethnic representation amongst participants.</p> |
| <p><b>2</b> The Office of Inspector General recommends that inoperable tablets be repaired or replaced and continues to recommend that the Sheriff’s Department pursue full implementation of tablets throughout the Custody Services Division (CSD).</p> <p><b>Recommendation Implemented:</b><br/>Partially implemented</p>   | <p>There are presently 165 iPads installed in jail facilities. Of the installed iPads, 41 (less than 25%) are functional.</p>   |

## OFFICE OF INSPECTOR GENERAL REPORTS 2023

| 2023 Recommendations |       |
|----------------------|-------|
| Status               | Total |
| Implemented          | 0     |
| Not Implemented      | 23    |

**ADDRESSING RACIAL DISPARITIES IN TRAFFIC STOPS**  
**Published March 2023**

| RECOMMENDATION   | ORIGINAL ISSUE  |
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| <p><b>1</b> The Sheriff’s Department should create a policy restricting pretextual stops, including but not limited to the following provisions:</p> <p>a. Deputies shall not conduct pretextual investigatory stops unless they have articulable reasonable suspicion (not a mere hunch) regarding a serious crime in addition to ascertaining probable cause of a minor offense, such as a traffic violation (excluding traffic/equipment stops enumerated in Recommendation 4)</p> <p>b. Deputies shall articulate on their BWC the reason for the stop prior to their encounter with an individual. Any citations and warnings resulting from a stop, should also be articulated on BWC including the deputy’s response to any questions posed by the individual stopped.</p> <p>c. If deputies fail to follow the policy as enumerated, the Department may initiate an administrative investigation with the appropriate disciplinary outcome; and</p> <p>d. Deputies shall adhere to Manual of Policy and Procedure 5-08/520.05 by not using a person’s race, color, ethnicity, national origin, religion, gender, gender identity, disability, or sexual orientation as a factor, to any extent or degree, in establishing reasonable suspicion or probable cause except as part of actual and credible description(s) of a specific suspect or suspects in any criminal investigation.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> | <p>The Sheriff’s Department has no policies restricting pretextual stops. In a 2019 report, the Office of Inspector General found a special enforcement team used “criminal profiles” to carry out pretextual stops, including factors such driving a car that needs repairs, driving with an out-of-state license plate, acting too calmly or nervously, and having a car with air fresheners. The analysis in the report also showed Latinos were stopped at a disproportionate rate.</p> <p>The Los Angeles Police Department instituted a pretextual stop policy as have other law enforcement agencies.</p> <p>Adopting such policies has been shown to have the effect of reducing racial disparities in stops, detentions, prolonged detentions, and searches.</p> |

| RECOMMENDATION  | ORIGINAL ISSUE   |
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| <p><b>2</b> The Sheriff’s Department should limit pretextual investigative stops by creating policies restricting deputies from stopping, detaining, or arresting, drivers, bicyclists, and pedestrians for certain safety equipment and low-level traffic violations such as the following offenses:</p> <ul style="list-style-type: none"> <li>a. Failure to display registration tags or driving with expired tags;</li> <li>b. A single brake or headlight out;</li> <li>c. Loud muffler;</li> <li>d. Rearview mirror decorations or objects on a rearview mirror unless it impairs the driver’s view and ability to operate the vehicle safely;</li> <li>e. Failure to illuminate license plates;</li> <li>f. Improperly placed license plates;</li> <li>g. Tinted windows;</li> <li>h. Cracked windshield unless the driver’s view is so obstructed as to create a condition that substantially increases the likelihood of injury or death;</li> <li>i. Failing to signal while turning or switching lanes;</li> <li>j. Failure to have a seatbelt fastened, other than an improperly restrained minor under the age of 14; or</li> <li>k. Crossing outside of a cross walk or against a traffic light when safe.</li> </ul> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> | <p>In November 2021, the Los Angeles Times published the results of its investigation in the Sheriff’s Department’s use of minor stops to search bicyclists finding that Latinos were affected disproportionately. The investigation by the Times found deputies searched 85% of bike riders they stopped even though they had no reason to suspect they would find anything illegal. They also found illegal items were located a mere 8% of the time and weapons were seized in less than .5% of all searches.</p> |



| RECOMMENDATION  | ORIGINAL ISSUE  |
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| <p><b>3</b> The Sheriff’s Department should enact a policy to comply with section 2806.5 of the California Vehicle Code (AB 2773) prior to its effective date of January 1, 2024, requiring deputies:</p> <ul style="list-style-type: none"> <li>a. to state the reason for the stop prior to any questioning, unless the deputy reasonably believes that withholding the reason for the stop is necessary to protect life or property from imminent threat.</li> <li>b. requires the deputy to document in a report or on the citation the reason for the stop.</li> </ul> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> | <p>The Sheriff’s Department has not enacted a policy to comply with section 2806.5 of the California Vehicle Code and it must do so prior to January 1, 2024.</p>   |
| <p><b>4</b> The Sheriff’s Department should enact a policy to comply with Assembly Bill 2147 prohibiting jaywalking stops absent circumstances that would cause a reasonably careful person to believe that there is an immediate danger of a collision.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>  | <p>Since the passage of AB 2147 in November 2022, the Sheriff’s Department has not created a policy enacting the language and spirit of the law.</p>  |
| <p><b>5</b> The Sheriff’s Department should create a policy limiting when deputies conducting traffic stops of vehicles, bicycles, and pedestrians inquire whether the person is on probation or parole.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>  | <p>Latinos and Black people were searched at much higher rates than White drivers. Law enforcement officers routinely inquire as to a person’s probation or parole status during a detention and conduct a search based on the status absent any underlying reason. The Berkeley City Council voted to implement a policy that its police officers are not permitted to inquire about a person’s probation or parole status without an underlying</p> |

| RECOMMENDATION   | ORIGINAL ISSUE  |
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|  | reason as a way to address disparate impacts in policing , even if it is during a stop for an infraction or a consensual encounter.   |
| <p><b>6</b> The Sheriff’s Department should collect, review and analyze data on a yearly basis to determine the impact of these polices on racial disparities in traffic stops.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>The Sheriff’s Department now publishes an <a href="#">AB-953 R.I.P.A. Stop Data Dashboard</a></p> | Currently, the Sheriff’s Department has not enacted the policy recommendations from this report. When it does, it should collect and analyze the data to measure the impact and report to the public. |

**REPORT BACK ON IMPROVING SCHOOL CLIMATE AND SAFETY**  
**Published April 2023**

| RECOMMENDATION  | ORIGINAL ISSUE  |
|---|---|
| <p><b>1</b> To help mitigate the negative effects of potential school-based racial bias on School Resource Deputy (SRD) referrals, the Office of Inspector General recommends that Sheriff’s Department SRD contracts should include the following:</p> <ul style="list-style-type: none"> <li>• A clear definition of the roles and responsibilities of the SRD, the school district and the school site, including a detailed plan outlining a process for student referrals to SRDs;</li> <li>• The extent to which information will be shared between the school district and Sheriff’s Department consistent with state and federal laws;</li> </ul> | The Office of Inspector General was unable to identify Sheriff’s Department or school district policies that clearly defined the types of student behavior and/or types of issues requiring the assistance of an SRD, and/or what types of student behavior would be tolerated for a period of time before requiring the SRDs to step-in, and/or what constituted an issue for which a SRD can be consulted, or for that matter any other scope and/or guidance as to a SRD’s role should be in a school. |

| RECOMMENDATION   | ORIGINAL ISSUE  |
|--|---|
| <ul style="list-style-type: none"> <li>• Requirement for qualifications and training of SRDs;</li> <li>• Assigned hours of SRD duty in and around school locations; and</li> <li>• A system of SRD performance monitoring that is available to the public.</li> </ul> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>  |   |
| <p><b>2</b> The Sheriff’s Department should publish CAD system statistics on all SRD contacts with students including the data points listed in the Board’s June 8, 2021, motion entitled Strengthening Oversight of School Law Enforcement Services. The Sheriff’s Department should also track and publish data on how many SRD contacts resulted in uses-of-force on students and the level of force used.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>The Sheriff’s Department now publishes an <a href="#">AB-953 R.I.P.A. Stop Data Dashboard</a>, that includes some information on stops by School Resource Deputies.</p> | <p>The Sheriff’s Department does not publish CAD system statistics on all SRD contacts with students.</p> |

**INSPECTOR GENERAL’S SEVENTH IMPLEMENTATION STATUS  
REPORT – JOHNSON V. LOS ANGELES COUNTY SHERIFF’S  
DEPARTMENT**

**Published May 2023**

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p><b>1</b> The Department should provide grievance team staff with additional training on designating ADA-related grievances as “ADA,” in accordance</p> | <p>Under paragraph 2 of section G of the <i>Johnson v. LASD</i> Settlement Agreement, “[a]ll grievances involving mobility</p> |

| RECOMMENDATION   | ORIGINAL ISSUE   |
|--|--|
| <p>with LASD policy CDM section 8-03/030.00, "ADA-Related Requests and Grievances."</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>The Sheriff's Department reports that in September of 2023, training was provided to the facility Grievance Team Lieutenants that included the proper processing and handling of ADA-related grievances. The Inspector General will determine progress with compliance in its next <i>Johnson v. LASD</i> implementation status report that is expected to be filed with the court on April 1, 2024.</p>   | <p>assistive devices and the physical accessibility of the Jail shall be designated 'ADA' grievances even if the inmate who filed the grievance did not check the 'ADA' box." As of the <i>Inspector General's Seventh Implementation Status Report</i>, the Department remains in partial compliance with this provision.</p>   |
| <p><b>2</b> The Department should provide additional training to all custody personnel regarding the requirement to distribute egg crate mattresses to all Class Members and ensure that adequate supplies of mattresses are available for distribution in all relevant housing locations.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>The Sheriff's Department reports that CCSB began monthly spot checks for egg crate mattresses in May 2023 in the facilities housing ADA Class Members. During these spot checks, which occurred once or twice each month, CCSB held briefings with custody personnel covering the egg crate mattress policy. CCSB reports posting the egg-crate mattress policy in the deputy booths. The Inspector General will determine progress with compliance in its next <i>Johnson v. LASD</i> implementation status report</p> | <p>LASD leadership agreed to issuing egg crate mattress to all <i>Johnson</i> Class Members, regardless of whether they had a prescription, as a reasonable accommodation. As reported in the <i>Inspector General's Seventh Implementation Report</i>, the OIG, through site visits and interviews, found that 29% of Class Members who sought egg crate mattresses had not received one.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE   |
|--|--|
| <p>that is expected to be filed with the court on April 1, 2024.</p>   |  |
| <p><b>3</b> The Department should promulgate policy and issue facility unit orders that reflects its current practice of providing all Class Members with thermal clothing. The Department should also ensure that all custody personnel are aware of where thermal clothing is stored in the jail facilities and the requirement to provide Class Members with thermal tops and bottoms upon arrival to their respective housing locations.</p> <p><b>Recommendation Implemented:</b><br/> Not implemented<br/> 2023 update:<br/> The Sheriff’s Department reports that beginning in October 2023, thermals are to be provided to all persons in custody and updated CDM 5-11/060.00 to include thermal shirts and pants as standard issue clothing. Facility Units Orders were updated to reflect the policy change and are in varying stages of approval. The Inspector General will determine progress with compliance in its next <i>Johnson v. LASD</i> implementation status report that is expected to be filed with the court on April 1, 2024.</p> | <p>The Department indicated that it would provide all Class Members with thermals, including tops and bottoms, without requiring a prescription. As reported in the <i>Inspector General’s Seventh Implementation Status Report</i>, OIG personnel spoke with a total of 59 Class Members who were eligible to receive thermal clothing at TTCF, MCJ, and CRDF. Of the 59 Class Members, 42 – or 71% – reported having received thermal tops and bottoms. As such, the OIG reported that the Department lacks a durable mechanism to distribute thermal clothing adequately and consistently throughout MCJ, TTCF, and CRDF.</p> |

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p><b>4</b> CCSB should take a more active role in not only conducting and documenting spot checks, but also working with custody personnel to ensure that all Class Members receive appropriately sized thermal clothing.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>The Sheriff’s Department reports that CCSB began monthly spot checks for compliance with distribution of thermal clothing began in May 2023 in the facilities housing ADA Class Members. During these spot checks, which occurred once or twice each month, CCSB held briefings with custody personnel covering the thermal clothing distribution and exchange policy. The Inspector General will determine progress with compliance in its next <i>Johnson v. LASD</i> implementation status report that is expected to be filed with the court on April 1, 2024.</p> | <p>The Department indicated that it would provide all Class Members with thermals, including tops and bottoms, without requiring a prescription. As reported in the <i>Inspector General’s Seventh Implementation Status Report</i>, OIG personnel spoke with a total of 59 Class Members who were eligible to receive thermal clothing at TTCF, MCJ, and CRDF. Of the 59 Class Members, 42 – or 71% – reported having received thermal tops and bottoms. As such, the OIG reported that the Department lacks a durable mechanism to distribute thermal clothing adequately and consistently throughout MCJ, TTCF, and CRDF.</p> |

**REFORM AND OVERSIGHT EFFORTS: LOS ANGELES COUNTY  
SHERIFF’S DEPARTMENT JANUARY TO MARCH 2023  
Published June 2023**

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p><b>1</b> EFRC panel engage in a robust discussion in each use of force case as to deputies’ actions prior to using force, an analysis of what led the deputies to use force, an analysis of the de-escalation tactics used, if any, and a review of the totality of circumstances.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> | <p>On the afternoon of February 16, 2016, a deputy assigned to patrol at the Cerritos Sheriff’s Station was involved in a questionable deputy involved shooting. The case was discussed at EFRC however the panel did not look at several policy violations, did not examine the deputy’s misstatements, and/or any attempts at de-escalation.</p> |

| RECOMMENDATION  | ORIGINAL ISSUE  |
|---|---|
| <p><b>2</b> EFRC set forth in its findings not only the reasons it found any policy violated, but its findings and the reasoning supporting a determination that a use of deadly force complied within Sheriff's Department policy.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>           | <p>The Sheriff's Department originally indicated that this case would proceed to Case Review following the EFRC. Yet inexplicably, and without a discussion of all of the factors mentioned above, the EFRC panel determined that, while there were some shortcomings in the deputy's tactics in approaching the incident, there were no violations of either the policy on use of deadly force or the policy on shooting at moving vehicles and did not reach any findings that required the matter to advance to a Case Review. This is despite the fact that the filing by the District Attorney's Office indicated that the deputy's conduct amounted to voluntary manslaughter, which clearly equates to a use of force that is out of policy.</p> |
| <p><b>3</b> The Office of Inspector General recommends that the Sheriff's Department amend its procedures to require a Case Review in all deputy-involved uses of force that resulted in a criminal filing by the District Attorney's Office.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> | <p>The Sheriff's Department's case review process requires a more in-depth look at the circumstances and potential policy violations. Ensuring these types of cases receive a more in-depth review would alleviate some of the shortcomings inherent in the EFRC process.</p>   |

| RECOMMENDATION   | ORIGINAL ISSUE  |
|--|---|
| <p><b>4</b> The Office of Inspector General recommends that the Sheriff’s Department consider strengthening its policy to require deputies on patrol to administer Narcan where they encounter signs of an overdose, as deputies in custody are required to do, and that the Sheriff’s Department examine the possibility of authorizing deputies to administer Narcan where they have clear evidence a person has taken dangerous amounts of opioids, even before the person presents symptoms.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>   | <p>On June 8, 2022, a deputy assigned to the Altadena Station conducted a traffic stop and during the course of the stop the suspect begin exhibiting signs of distress. Deputies observed a white powdery substance and a small plastic bag which was in the suspect’s mouth. Deputies discussed whether they should administer Narcan but ruled it out because they believed it should only be used on persons who were unconscious, and the man was still alert and conscious.</p> |
| <p><b>5</b> The Office of Inspector General recommends the adoption of a policy mandating that each patrol deputy be issued a kit, that the kit have two Narcan doses in it at the outset of each shift, and mandate that the kit be carried during each patrol shift.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update<br/>In September an email was sent to Sheriff’s Department personnel regarding the exchange of expired Narcan and reminding personnel to ensure that their Narcan Nasal spray is not expired, to store it in their department-issued Cardiopulmonary Resuscitation/First Aid kits, to protect it from excessive heat and light, that Narcan spray has a two-year shelf-life, and that replacement spray can be obtained from the station/unit’s training coordinator.</p> | <p>Although many patrol deputies carry Narcan, the Sheriff’s Department does not mandate it. The Sheriff’s Department issues medical kits to patrol deputies, but it is unclear that kits are issued to every patrol deputy.</p>  |



| RECOMMENDATION   | ORIGINAL ISSUE   |
|--|--|
| <p><b>6</b> The policy for administering Narcan to persons by patrol deputies is ambiguous. While the signs of an opioid overdose are included in Field Operations Directive 17-002, deputies are directed to administer Narcan in the event the patient “is not breathing and is unresponsive,” or if the deputy “suspect[s] the patient is unconscious due to an opioid overdose.” The Office of Inspector General recommends that the policy direct deputies to administer Narcan if any of the signs of an opioid overdose are present.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p>  |  |
| <p><b>7</b> The Office of Inspector General strongly recommends that the Sheriff’s Department formulate a plan well before next winter for how to monitor temperatures inside units and to distribute these thermal undergarments to people in custody to alleviate uncomfortably, and sometimes dangerously, cold conditions of confinement.</p> <p><b>Recommendation Implemented:</b><br/>Partially implemented<br/>2023 Update:<br/>On July 11, 2023, the Board of Supervisors adopted a motion which instructed the Sheriff’s Department to provide all people in custody who request thermal undergarments with a top and bottom with its current surplus. During the week of October 2, 2023, the Sheriff’s Department began distributing thermal undergarments (top and bottom) and updated CDM 5-11/060.00 to include thermal shirts and pants as standard issue clothing. Facility Units Orders</p> | <p>Los Angeles County jail facilities experienced perilously low temperatures during the winter of 2022/2023. Despite possessing approximately 315,000 long sleeved thermal tops and bottoms in its inventory, the Sheriff’s Department did not distribute these garments to people in custody to compensate for cold temperatures within the jails.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE  |
|--|---|
| <p>were updated to reflect the policy change and are in varying stages of approval.</p> <p>The Sheriff’s Department received one shipment, consisting of 30,600 thermal tops and 31,032 pants, and reported that they have ordered additional thermal undergarments with one-time AB109 revenue. There are five outstanding orders.</p> <p>At some facilities, there are reports from staff of inconsistent distribution of thermal undergarments due to inventory issues. The OIG received complaints from people in custody that it is difficult to obtain larger-sized thermal undergarments and that their requests for larger sizes are unfulfilled. Some also complain that they have not received a full set of thermal undergarments. The Sheriff’s Department reports that they are actively working to provide thermal undergarments to all people in custody.</p> <p>The Sheriff’s Department reports that temperatures in facilities are monitored and noted in the eUDAL system. However, during recent jail site visits OIG staff determined that temperatures are not monitored in some housing locations due to a lack of functional thermometers. During site visits in the end of December 2023, OIG noted temperatures as low as 60 degrees Fahrenheit.</p> |   |
| <p><b>8</b> The Office of Inspector General strongly recommends that inoperable tablets be repaired or replaced and continues to recommend that the Sheriff’s Department pursue full implementation of tablets throughout the Custody Services Division.</p>   | <p>There are presently 165 iPads installed in jail facilities. Of the installed iPads, 41 (less than 25%) are functional.</p> |

| RECOMMENDATION   | ORIGINAL ISSUE |
|--|----------------|
| <p><b>Recommendation Implemented:</b><br/>Not implemented</p> <p>2023 Update:<br/>According to the Sheriff's Department, the lack of dedicated data lines for tablets requires that the tablets must be manually reset. The Sheriff's Department's Correctional Innovative Technologies Unit (CITU) is training facility staff on the reset process to facilitate tablet functionality. The Sheriff's Department reports that malfunctioning tablets are replaced. Damaged tablets are a challenge as protective cases impact connectivity, which leaves the tablets vulnerable to vandalism. The Department advocates contracting with a telephone provider with tablet technology to improve tablet functionality.</p> |                |

**REFORM AND OVERSIGHT EFFORTS: LOS ANGELES COUNTY  
SHERIFF'S DEPARTMENT APRIL TO JUNE 2023  
Published August 2023**

| RECOMMENDATION   | ORIGINAL ISSUE  |
|--|---|
| <p><b>1</b> In February 2021, the Office of Inspector General issued a detailed report identifying problems with LASD fact-finding. We urge the Sheriff's Department to adopt its recommendations.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented</p> | <p>During the review of a category 3 use-of-force, an OIG representative inquired about a potential issue that Internal Affairs investigators and the Department's fact-finding panel failed to identify.</p> |

| RECOMMENDATION  | ORIGINAL ISSUE   |
|---|--|
| <p><b>2</b> The Sheriff’s Department should evaluate the effectiveness of this guidance by reviewing the entries into the e-LOTS system.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>The Sheriff’s Department reports that monthly reminders are provided to facility operations staff to ensure proper documentation into e-LOTS and individuals placed on contraband watch require notification to CISU who tracks and ensures an entry is made.</p>   | <p>The Custody Support Services Bureau intends to create guidance on the responsibilities for documentation of found contraband into e-LOTS.</p>           |
| <p><b>3</b> In addition to repairing or replacing nonfunctional tablets, the Sheriff’s Department should work to determine why tablets have been breaking and implement a system to ensure sufficient tablets remain operational.</p> <p><b>Recommendation Implemented:</b><br/>Not implemented<br/>2023 Update:<br/>According to the Sheriff’s Department, the lack of dedicated data lines for tablets requires that the tablets must be manually reset. The Sheriff’s Department’s Correctional Innovative Technologies Unit (CITU) is training facility staff on the reset process to facilitate tablet functionality. The Sheriff’s Department reports that malfunctioning tablets are replaced. Damaged tablets are a challenge as protective cases impact connectivity, which leaves the tablets vulnerable to vandalism. The Department advocates contracting with a telephone provider with tablet technology to improve tablet functionality.</p> | <p>Nearly 75% of the computer tablets (tablets) installed to collect information on requests and grievances filed by people in custody are inoperable.</p> |

## OFFICE OF INSPECTOR GENERAL 2023 PREA AUDIT RECOMMENDATIONS

| <b>Recommendation Status</b> |                                     |             |                 |
|------------------------------|-------------------------------------|-------------|-----------------|
| Station                      | Implemented without Recommendations | Implemented | Not Implemented |
| Lakewood                     | 6                                   | 5           | 24              |
| Marina del Rey               | 11                                  | 6           | 18              |
| Lomita                       | 11                                  | 8           | 16              |
| East Los Angeles             | 10                                  | 9           | 16              |
| <b>Total</b>                 | <b>38</b>                           | <b>28</b>   | <b>74</b>       |

| <b>Lakewood Station Recommendations</b> |       |
|---|-------|
| Status                                  | Total |
| Implemented without Recommendations     | 6     |
| Implemented                             | 5     |
| Not Implemented                         | 24    |

**Prison Rape Elimination Act Facility Audit Report - Los Angeles  
County Sheriff's Department - Lakewood Station  
Published May 2023**

| STANDARDS NOT MET |  |                 |
|-------------------|--|-----------------|
| STANDARD          | RECOMMENDATION STATUS  |                 |
| <b>1</b>          | 115.111 – Zero tolerance of sexual abuse and sexual harassment; PREA coordinator | Not Implemented |
| <b>2</b>          | 115.113 – Supervision and monitoring   | Not Implemented |
| <b>3</b>          | 115.115 – Limits to cross-gender viewing and searches                            | Not Implemented |

|           |  |                 |
|-----------|--|-----------------|
| <b>4</b>  | 115.116 – Detainees with disabilities and detainees who are limited English proficient               | Not Implemented |
| <b>5</b>  | 115.117 – Hiring and promotion decisions   | Implemented     |
| <b>6</b>  | 115.118 – Upgrades to facilities and technologies  | Implemented     |
| <b>7</b>  | 115.121 – Evidence protocol and forensic medical examinations  | Not Implemented |
| <b>8</b>  | 115.122 – Policies to ensure referrals of allegations for investigations                             | Not Implemented |
| <b>9</b>  | 115.131 – Employee and volunteer training  | Not Implemented |
| <b>10</b> | 115.132 – Detainee, contractor, and inmate worker notification of the agency’s zero tolerance policy | Not Implemented |
| <b>11</b> | 115.134 – Specialized training: Investigations   | Not Implemented |
| <b>12</b> | 115.141 – Screening for risk of victimization and abusiveness  | Not Implemented |
| <b>13</b> | 115.151 – Detainee reporting   | Not Implemented |
| <b>14</b> | 115.161 – Staff and agency reporting duties  | Not Implemented |
| <b>15</b> | 115.162 – Agency protection duties   | Not Implemented |
| <b>16</b> | 115.163 – Reporting to other confinement facilities  | Not Implemented |
| <b>17</b> | 115.164 – Staff first responder duties   | Not Implemented |
| <b>18</b> | 115.165 – Coordinated response   | Not Implemented |
| <b>19</b> | 115.167 – Agency protection against retaliation  | Not Implemented |

|           |   |                 |
|-----------|---|-----------------|
| <b>20</b> | 115.171 – Criminal and administrative agency investigations               | Not Implemented |
| <b>21</b> | 115.172 – Evidentiary standard for administrative investigations          | Not Implemented |
| <b>22</b> | 115.176 – Disciplinary sanctions for staff                                | Not Implemented |
| <b>23</b> | 115.177 – Corrective action for contractors and volunteers                | Not Implemented |
| <b>24</b> | 115.178 – Referrals for prosecution for detainee-on-detainee sexual abuse | Implemented     |
| <b>25</b> | 115.186 – Sexual abuse incident reviews                                   | Not Implemented |
| <b>26</b> | 115.187 – Data collection   | Implemented     |
| <b>27</b> | 115.188 – Data review for corrective action                               | Not Implemented |
| <b>28</b> | 115.189 – Data storage, publication, and destruction                      | Implemented     |
| <b>29</b> | 115.401 – Frequency and scope of audits                                   | Not Implemented |

| <b>STANDARDS MET; NO RECOMMENDATIONS</b> |  |  |
|--|--|--|
| <b>1</b>                                 | 115.112 – Contracting with other entities for the confinement of detainees       |  |
| <b>2</b>                                 | 115.114 Juveniles and youthful detainees   |  |
| <b>3</b>                                 | 115.154 Third-party reporting  |  |
| <b>4</b>                                 | 115.166 – Preservation of ability to protect detainees from contact with abusers |  |
| <b>5</b>                                 | 115.182 – Access to emergency medical services                                   |  |
| <b>6</b>                                 | 115.403 – Audit contents and findings  |  |

| <b>Marina del Rey Station Recommendations</b> |              |
|---|--------------|
| <b>Status</b>                                 | <b>Total</b> |
| <b>Implemented without Recommendations</b>    | <b>11</b>    |
| <b>Implemented</b>                            | <b>6</b>     |
| <b>Not Implemented</b>                        | <b>18</b>    |

**Prison Rape Elimination Act Facility Audit Report - Los Angeles  
County Sheriff's Department – Marina del Rey Station  
Published June 2023**

| <b>STANDARDS NOT MET</b> |  |                 |
|--------------------------|--|-----------------|
| <b>STANDARD</b>          | <b>RECOMMENDATION STATUS</b>   |                 |
| <b>1</b>                 | 115.111 – Zero tolerance of sexual abuse and sexual harassment; PREA coordinator                     | Not Implemented |
| <b>2</b>                 | 115.113 – Supervision and monitoring   | Not Implemented |
| <b>3</b>                 | 115.115 – Limits to cross-gender viewing and searches  | Not Implemented |
| <b>4</b>                 | 115.116 – Detainees with disabilities and detainees who are limited English proficient               | Not Implemented |
| <b>5</b>                 | 115.117 – Hiring and promotion decisions   | Implemented     |
| <b>6</b>                 | 115.121 – Evidence protocol and forensic medical examinations  | Not Implemented |
| <b>7</b>                 | 115.122 – Policies to ensure referrals of allegations for investigations                             | Not Implemented |
| <b>8</b>                 | 115.131 – Employee and volunteer training  | Implemented     |
| <b>9</b>                 | 115.132 – Detainee, contractor, and inmate worker notification of the agency's zero tolerance policy | Not Implemented |
| <b>10</b>                | 115.134 – Specialized training: Investigations   | Not Implemented |



|           |   |                 |
|-----------|---|-----------------|
| <b>11</b> | 115.151 – Detainee reporting  | Not Implemented |
| <b>12</b> | 115.161 – Staff and agency reporting duties                               | Not Implemented |
| <b>13</b> | 115.163 – Reporting to other confinement facilities                       | Implemented     |
| <b>14</b> | 115.164 – Staff first responder duties                                    | Not Implemented |
| <b>15</b> | 115.165 – Coordinated response  | Not Implemented |
| <b>16</b> | 115.167 – Agency protection against retaliation                           | Not Implemented |
| <b>17</b> | 115.171 – Criminal and administrative agency investigations               | Not Implemented |
| <b>18</b> | 115.172 – Evidentiary standard for administrative investigations          | Not Implemented |
| <b>19</b> | 115.176 – Disciplinary sanctions for staff                                | Not Implemented |
| <b>20</b> | 115.177 – Corrective action for contractors and volunteers                | Not Implemented |
| <b>21</b> | 115.178 – Referrals for prosecution for detainee-on-detainee sexual abuse | Implemented     |
| <b>22</b> | 115.187 – Data collection   | Implemented     |
| <b>23</b> | 115.188 – Data review for corrective action                               | Not Implemented |
| <b>24</b> | 115.189 – Data storage, publication, and destruction                      | Implemented     |

| <b>STANDARDS MET; NO RECOMMENDATIONS</b> |  |  |
|--|--|--|
| <b>1</b>                                 | 115.112 – Contracting with other entities for the confinement of detainees |  |
| <b>2</b>                                 | 115.114 – Juveniles and youthful detainees                                 |  |
| <b>3</b>                                 | 115.118 – Upgrades to facilities and technologies                          |  |

|           |  |
|-----------|--|
| <b>4</b>  | 115.141 – Screening for risk of victimization and abusiveness                    |
| <b>5</b>  | 115.154 – Third-party reporting  |
| <b>6</b>  | 115.162 – Agency protection duties   |
| <b>7</b>  | 115.166 – Preservation of ability to protect detainees from contact with abusers |
| <b>8</b>  | 115.182 – Access to emergency medical services                                   |
| <b>9</b>  | 115.186 – Sexual abuse incident reviews  |
| <b>10</b> | 115.401 – Frequency and scope of audits  |
| <b>11</b> | 115.403 – Audit contents and findings  |

| <b>Lomita Station Recommendations</b>      |           |
|--|-----------|
| Status                                     | Total     |
| <b>Implemented without Recommendations</b> | <b>11</b> |
| <b>Implemented</b>                         | <b>8</b>  |
| <b>Not Implemented</b>                     | <b>16</b> |

**Prison Rape Elimination Act Facility Audit Report - Los Angeles  
County Sheriff's Department – Lomita Station  
Published July 2023**

| <b>STANDARDS NOT MET</b> |  |                              |
|--------------------------|--|------------------------------|
|                          | <b>STANDARD</b>  | <b>RECOMMENDATION STATUS</b> |
| <b>1</b>                 | 115.111 – Zero tolerance of sexual abuse and sexual harassment; PREA coordinator | Not Implemented              |
| <b>2</b>                 | 115.113 – Supervision and monitoring   | Implemented                  |
| <b>3</b>                 | 115.115 – Limits to cross-gender viewing and searches                            | Not Implemented              |

|           |  |                 |
|-----------|--|-----------------|
| <b>4</b>  | 115.116 – Detainees with disabilities and detainees who are limited English proficient               | Not Implemented |
| <b>5</b>  | 115.117 – Hiring and promotion decisions   | Implemented     |
| <b>6</b>  | 115.121 – Evidence protocol and forensic medical examinations  | Not Implemented |
| <b>7</b>  | 115.122 – Policies to ensure referrals of allegations for investigations                             | Not Implemented |
| <b>8</b>  | 115.131 – Employee and volunteer training  | Implemented     |
| <b>9</b>  | 115.132 – Detainee, contractor, and inmate worker notification of the agency’s zero tolerance policy | Not Implemented |
| <b>10</b> | 115.134 – Specialized training: Investigations   | Not Implemented |
| <b>11</b> | 115.151 – Detainee reporting   | Implemented     |
| <b>12</b> | 115.161 – Staff and agency reporting duties  | Not Implemented |
| <b>13</b> | 115.163 – Reporting to other confinement facilities  | Not Implemented |
| <b>14</b> | 115.164 – Staff first responder duties   | Implemented     |
| <b>15</b> | 115.165 – Coordinated response   | Not Implemented |
| <b>16</b> | 115.167 – Agency protection against retaliation  | Not Implemented |
| <b>17</b> | 115.171 – Criminal and administrative agency investigations  | Not Implemented |
| <b>18</b> | 115.172 – Evidentiary standard for administrative investigations                                     | Not Implemented |
| <b>19</b> | 115.176 – Disciplinary sanctions for staff   | Not Implemented |

|           |   |                 |
|-----------|---|-----------------|
| <b>20</b> | 115.177 – Corrective action for contractors and volunteers                | Not Implemented |
| <b>21</b> | 115.178 – Referrals for prosecution for detainee-on-detainee sexual abuse | Implemented     |
| <b>22</b> | 115.187 – Data collection   | Implemented     |
| <b>23</b> | 115.188 – Data review for corrective action                               | Not Implemented |
| <b>24</b> | 115.189 – Data storage, publication, and destruction                      | Implemented     |

| <b>STANDARDS MET; NO RECOMMENDATIONS</b> |  |  |
|--|--|--|
| <b>1</b>                                 | 115.112 – Contracting with other entities for the confinement of detainees       |  |
| <b>2</b>                                 | 115.114 – Juveniles and youthful detainees                                       |  |
| <b>3</b>                                 | 115.118 – Upgrades to facilities and technologies                                |  |
| <b>4</b>                                 | 115.141 – Screening for risk of victimization and abusiveness                    |  |
| <b>5</b>                                 | 115.154 – Third-party reporting  |  |
| <b>6</b>                                 | 115.162 – Agency protection duties   |  |
| <b>7</b>                                 | 115.166 – Preservation of ability to protect detainees from contact with abusers |  |
| <b>8</b>                                 | 115.182 – Access to emergency medical services                                   |  |
| <b>9</b>                                 | 115.186 – Sexual abuse incident reviews  |  |
| <b>10</b>                                | 115.401 – Frequency and scope of audits  |  |
| <b>11</b>                                | 115.403 – Audit contents and findings  |  |

| <b>East Los Angeles Station Recommendations</b> |              |
|---|--------------|
| <b>Status</b>                                   | <b>Total</b> |
| <b>Implemented without Recommendations</b>      | <b>10</b>    |
| <b>Implemented</b>                              | <b>9</b>     |
| <b>Not Implemented</b>                          | <b>16</b>    |

**Prison Rape Elimination Act Facility Audit Report - Los Angeles  
County Sheriff's Department – East Los Angeles Station  
Published July 2023**

| <b>STANDARDS NOT MET</b> |  |                 |
|--------------------------|--|-----------------|
| <b>STANDARD</b>          | <b>RECOMMENDATION STATUS</b>   |                 |
| <b>1</b>                 | 115.111 – Zero tolerance of sexual abuse and sexual harassment; PREA coordinator                     | Not Implemented |
| <b>2</b>                 | 115.113 – Supervision and monitoring   | Implemented     |
| <b>3</b>                 | 115.115 – Limits to cross-gender viewing and searches  | Not Implemented |
| <b>4</b>                 | 115.116 – Detainees with disabilities and detainees who are limited English proficient               | Not Implemented |
| <b>5</b>                 | 115.117 – Hiring and promotion decisions   | Implemented     |
| <b>6</b>                 | 115.121 – Evidence protocol and forensic medical examinations  | Not Implemented |
| <b>7</b>                 | 115.122 – Policies to ensure referrals of allegations for investigations                             | Not Implemented |
| <b>8</b>                 | 115.131 – Employee and volunteer training  | Implemented     |
| <b>9</b>                 | 115.132 – Detainee, contractor, and inmate worker notification of the agency's zero tolerance policy | Not Implemented |

|           |   |                 |
|-----------|---|-----------------|
| <b>10</b> | 115.134 – Specialized training: Investigations                            | Not Implemented |
| <b>11</b> | 115.141 – Screening for risk of victimization and abusiveness             | Implemented     |
| <b>12</b> | 115.151 – Detainee reporting  | Implemented     |
| <b>13</b> | 115.161 – Staff and agency reporting duties                               | Not Implemented |
| <b>14</b> | 115.163 – Reporting to other confinement facilities                       | Not Implemented |
| <b>15</b> | 115.164 – Staff first responder duties                                    | Implemented     |
| <b>16</b> | 115.165 – Coordinated response  | Not Implemented |
| <b>17</b> | 115.167 – Agency protection against retaliation                           | Not Implemented |
| <b>18</b> | 115.171 – Criminal and administrative agency investigations               | Not Implemented |
| <b>19</b> | 115.172 – Evidentiary standard for administrative investigations          | Not Implemented |
| <b>20</b> | 115.176 – Disciplinary sanctions for staff                                | Not Implemented |
| <b>21</b> | 115.177 – Corrective action for contractors and volunteers                | Not Implemented |
| <b>22</b> | 115.178 – Referrals for prosecution for detainee-on-detainee sexual abuse | Implemented     |
| <b>23</b> | 115.187 – Data collection   | Implemented     |
| <b>24</b> | 115.188 – Data review for corrective action                               | Not Implemented |
| <b>25</b> | 115.189 – Data storage, publication, and destruction                      | Implemented     |

| <b>STANDARDS MET; NO RECOMMENDATIONS</b> |  |
|--|--|
| <b>1</b>                                 | 115.112 – Contracting with other entities for the confinement of detainees       |
| <b>2</b>                                 | 115.114 – Juveniles and youthful detainees                                       |
| <b>3</b>                                 | 115.118 – Upgrades to facilities and technologies                                |
| <b>4</b>                                 | 115.154 – Third-party reporting  |
| <b>5</b>                                 | 115.162 – Agency protection duties   |
| <b>6</b>                                 | 115.166 – Preservation of ability to protect detainees from contact with abusers |
| <b>7</b>                                 | 115.182 – Access to emergency medical services                                   |
| <b>8</b>                                 | 115.186 – Sexual abuse incident reviews  |
| <b>9</b>                                 | 115.401 – Frequency and scope of audits  |
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