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# **COUNTY OF LOS ANGELES** OFFICE OF INSPECTOR GENERAL

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April 20, 2020

TO:

Supervisor Kathryn Barger, Chair

Supervisor Hilda L. Solis

Supervisor Mark Ridley-Thomas

Supervisor Sheila Kuehl Supervisor Janice Hahn MHEJOUR

FROM:

Max Huntsman

Inspector General

SUBJECT:

SECOND REPORT BACK ON THE LOS ANGELES COUNTY SHERIFF'S DEPARTMENT'S PLAN TO UPGRADE THE DATA

SYSTEMS USED TO TRACK JAIL VIOLENCE

#### **Purpose of Memorandum:**

This is a second report back to your Board which follows up on the recommendations made in the July 2017 Office of Inspector General's report, A Review of the Jail Violence Tracking and Reporting of the Los Angeles County Sheriff's Department (hereinafter July 2017 Jail Violence Tracking report). That report reviewed the Los Angeles County Sheriff's Department's (the Sheriff's Department) procedures for tracking jail violence totals. This report supplements the Office of Inspector General's July 24, 2018 report back.

Please note that the scope of this report is limited to a review of the consistency of the procedural methods used by the Sheriff's Department to track jail violence data. Failures to follow Sheriff's Department policy on investigation of misconduct allegations and issues influencing proper reporting of force have been addressed elsewhere. This review is limited solely to the processes by which the Sheriff's Department tracks already reported incidents of jail violence.

The Sheriff's Department has made substantial efforts to improve the consistency of the methods it uses to track jail violence. The audits discussed below show that the Sheriff's Board of Supervisors April 20, 2020 Page **2** of **20** 

Department has improved the methodologies used to track and report the <u>reported</u> uses-of-force within its jails to yield more consistent and replicable results.

For this report, the Office of Inspector General reviewed the interim procedures used to track: 1) uses-of-force on inmates by staff, 2) inmate-on-staff assaults, and 3) inmate-on-inmate assaults. This report-back does not assess the validity of the Sheriff's Department's jail violence totals, only the reliability of its treatment of data related to such incidents. The Office of Inspector General staff conducted an evaluation and audit of the interim procedures implemented by the Sheriff's Department's Custody Division (Custody) in response to the recommendations made in the July 2017 Jail Violence Tracking report. We have determined that these procedures have yielded consistent and replicable totals for uses-of-force and inmate-assaults during the audit period reviewed. However, some issues remain with the Sheriff's Department's tracking of the categories of force used within an incident and the tracking of multiple assault victims in a single incident. The Office of Inspector General did not assess the validity of the underlying use-of-force data.

The recommendations set forth below are tailored to further refine the Sheriff's Department's data collection processes for tracking jail violence and to increase consistency and reliability of the data presented.

#### Background:

The July 2017 Jail Violence Tracking report identified the following deficiencies in the Sheriff's Department's tracking of jail violence totals:

- the Custody Division sourced its jail violence data from a decentralized system of multiple databases;
- there was little standardization in data tracking processes and procedures;
- the source databases were not systematically cross-reconciled to verify accuracy, resulting in reporting of totals that are "stale" and did not reflect the most current information; and
- there was a lack of clear accountability for the accuracy of custody jail violence data.

<sup>&</sup>lt;sup>1</sup> The audits summarized by this report assess the *reliability* of the Sheriff's Department's tracking of jail-related force data, not the *validity* of the underlying data collected (i.e. the report does not assess the accuracy with which the Sheriff's Department captures force incidents, only its treatment of the data once an event has been recorded.)

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On July 24, 2018, the Office of Inspector General submitted a follow-up report to your Board outlining the interim procedures the Sheriff's Department implemented to address the issues raised by the July 2017 Jail Violence Tracking report. The Sheriff's Department asserted that these interim procedures were yielding consistent and replicable jail violence totals.

For this report, the Office of Inspector General audited the interim procedures implemented by the Sheriff's Department to track jail violence totals to determine whether they were producing consistent and replicable results. The Office of Inspector General conducted audits of Custody use-of-force data-tracking procedures (Exhibit 1) and inmate-assault data tracking procedures (Exhibit 2). As discussed in detail below, the Office of Inspector General audits determined that the Department had made significant changes to jail violence tracking and that these interim procedures were yielding more consistent and replicable totals for the 2018 calendar year.<sup>2</sup>

- The Department has assigned the Custody Services Administration Command the sole accountability for the accuracy of jail violence data. Within that command:
  - o Custody Support Services Bureau is responsible for use-of-force data.
  - o Custody Investigative Services is responsible for inmate assault data.
- The Department has centralized jail violence data into two database systems:
  - The Electronic Line Operations Tracking System (e-LOTS) is utilized by Custody Support Services Bureau to compile and report use-of-force data.
  - The Los Angeles Regional Crime Information System (LARCIS) is utilized by Custody Investigative Services as the sole data source for compiling and reporting inmate-assaults.
- The Department has implemented standardized data tracking processes and procedures to ensure the totals of reported uses-of-force and inmate assaults are consistent and replicable.
  - The information contained within the Custody Division's force alerts, designed to timely notify facility managers of uses-of-force, has been standardized across facilities (although the forms themselves have not been standardized).

<sup>&</sup>lt;sup>2</sup> The Sheriff's Department's implementation of its interim procedures was largely complete by January 2018. Jail violence totals pre-dating 2018 should be treated with caution. Likewise, any comparisons between jail violence totals pre-dating 2018 and current totals should also be treated with caution.

- The Department has replaced the FAST program and the internal trackers for tracking inmate assaults with a single Custody Division crime analysis form (CSDCAF) and an exception report (LARCIS 9A Report), both within LARCIS, to compile all inmate assault data.
- The Department systemically reconciles database information with source documents to ensure that data totals reflect the most current information.
  - Use-of-force data is cross-reconciled using management force alerts, the Monthly Force Synopsis Report and e-LOTS.
  - o Inmate assaults are cross-reconciled with crime reports, the crime analysis forms and the exceptions report.

However, data entered into Performance Recording and Monitoring System (PRMS) is not reconciled in real time with e-LOTS. Force review investigations may take as long as a year to complete. PRMS is updated by the Discovery Unit of the Risk Management Bureau at or near the conclusion of the force review. Although each use-of-force reviewed will ultimately be reconciled with e-LOTS, that reconciliation is not timely.

#### **USE-OF-FORCE REPORTING**

The July 2017 Jail Violence Tracking report found that the Sheriff's Department relied on a variety of separate databases to compile and report Custody use-of-force totals, including but not limited to:

- ad hoc trackers maintained at each facility;
- the FAST<sup>3</sup> database; and
- the e-LOTS<sup>4</sup> database.

These databases were not cross-reconciled with updated information and oftentimes reflected different use-of-force totals.

The Sheriff's Department addressed this issue by designating the e-LOTS database as the sole source of use-of-force totals reported by the Sheriff's Department. In addition, the Sheriff's Department modified the "Monthly Force Used by Category" (MFCR) report

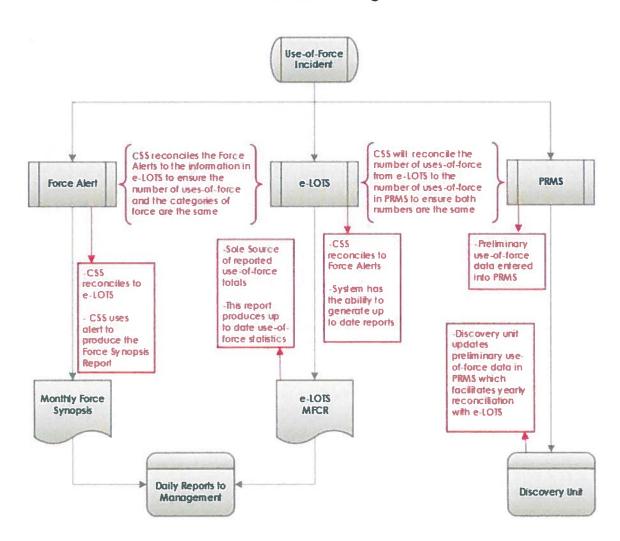
<sup>&</sup>lt;sup>3</sup> "FAST" is an acronym for "Facility Automated Statistical Tracking." FAST is a Custody Division database which is also used to track incidents involving the use-of-force by jail staff. Since the 2017 OIG Report was issued, all facilities reported that they stopped using the FAST system as a source of published use-of-force information.

<sup>&</sup>lt;sup>4</sup> The term e-LOTS is an acronym for "electronic-Line Operations Tracking System" which is a Custody Division database used to track use-of-force information.

produced by the e-LOTS database to immediately reflect changes in use-of-force totals and changes to the category of force used in an incident. The MFCR now provides the Sheriff's Department with real-time tracking of use-of-force totals by custody facilities and the categories of the force used in these incidents for a 24-month period.

The Sheriff's Department further streamlined its use-of-force reporting process and incorporated reconciliation mechanisms, as depicted in the chart below, to promote greater reliability and consistency.

# Interim Use-of-Force Tracking Procedures



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When a use-of-force is reported, the Sheriff's Department's staff initiates three interrelated tracking mechanisms: (1) a Force Alert,<sup>5</sup> (2) an e-LOTS entry, and (3) a preliminary Performance Recording and Monitoring System (PRMS)<sup>6</sup> entry.

### Force Alert

A Force Alert contains a synopsis of the incident along with other information generally related to the use-of-force and is designed to notify management that a use-of-force has occurred. The information presented in a Force Alert is preliminary and is subject to change during the force review process (such as changes to the category of force).<sup>7</sup> Although the format of the Force Alert is not standardized and varies by Custody facility, the information contained in each facility's Force Alert is roughly the same. Force Alerts in each facility routinely memorialize incident details including category of force, facility, synopsis of the incident and tracking numbers for PRMS and e-Lots.

The Custody Support Services (CSS) Bureau compiles the Force Alerts into a spreadsheet called the "Monthly Force Synopsis" (Force Synopsis). The Force Synopsis is a chronological compilation of all the Force Alerts that occur in a given month. This report is updated daily and contains a brief factual summary of each use-of-force incident. Because the Force Synopsis is based on information taken from Force Alerts, the information contained is preliminary and also subject to change as the incident moves through the use-of-force review process.

#### e-LOTS Entry

The e-LOTS database tracks a use-of-force incident through the various stages of the Sheriff's Department's force review process. The e-LOTS database tracks the status

<sup>&</sup>lt;sup>5</sup> Exhibit 3, example of a Force Alert.

<sup>&</sup>lt;sup>6</sup> Performance Recording and Monitoring System (PRMS) is a series of automated modules which include the following categories of records: administrative investigations; public commendations and complaints (Service Comment Reports); force review documentation; shooting review documentation; lawsuits; civil claims; Pitchess Motions; and special conditions on employees. See MPP 3-02/085.20, Automated Personnel Performance Databases.

<sup>&</sup>lt;sup>7</sup> The Department defines a use-of-force as "as any physical effort used to control or restrain another, or to overcome the resistance of another." MPP § 3-10/010.00. There are four general categories of reportable uses-of-force, including non-categorized incidents (NCI).

<sup>&</sup>lt;sup>8</sup> Exhibit 4, example of a Monthly Force Synopsis spreadsheet.

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and any changes to a use-of-force case, such as changes in the category of force. 9 The e-LOTS database compiles the total number of uses-of-force by the Custody Division and presents this data in the "Monthly Force Used by Category" report (or MFCR). 10 As discussed above, the MFCR lists the total monthly use-of-force by category for each custody facility for approximately two-years. The Department currently uses the MFCR as the sole source of reported use-of-force totals for the Custody Division to increase the consistency of its reported data.

#### PRMS Entry

Lastly, custody staff must enter all uses-of-force into the Preliminary Data Entry (PDE) module in PRMS. The PRMS system is a collection of automated databases that contains personnel information, including information related to administrative investigations and force review documentation. The PDE module entry serves as a place holder in the PRMS system for information that will eventually be transferred to PRMS at the end of the Sheriff's Department's force investigation process.

Once a use-of-force investigation is complete, it is sent to the Risk Management Bureau's Discovery Unit for final processing. The Discovery Unit updates the initial PDE entry with any changes (e.g. changes in category of force used) that were made during the use-of-force investigation and review process. As a result, the total use-of-force incidents in PRMS and e-LOTS should match after Discovery Unit staff updates the information in PRMS. Currently, a reconciliation between PRMS and e-LOTS 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 in PRMS.

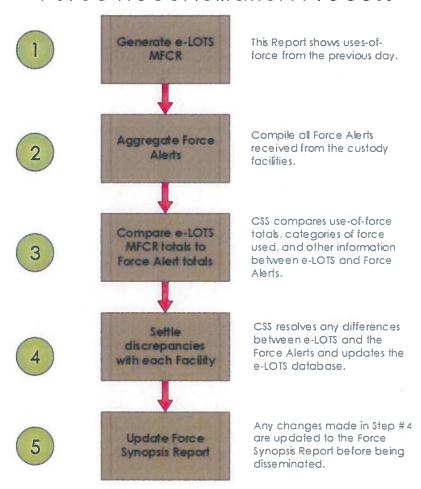
#### Reconciliation of Use-of-Force Totals

The Sheriff's Department has built in reconciliation points in its use-of-force tracking process to improve the consistency of its data. CSS matches the use-of-force totals from the e-LOTS MFCR with the Force Alerts received on a daily basis. CSS then contacts the custody facilities to resolve any inconsistencies and corrects the e-LOTS records if necessary. This reconciliation process is set forth in detail below.

<sup>&</sup>lt;sup>9</sup> This occurs when a reviewing supervisor determines that the category of the force used should be changed based on his/her review of the facts of the case.

<sup>&</sup>lt;sup>10</sup> Exhibit 5, example of a "Monthly Force Used by Category" report (MFCR).

# Force Reconciliation Process



In addition, CSS plans to reconcile e-LOTS use-of-force totals to the totals in PRMS and resolve any discrepancies that exist. However, due to the time it takes for a use-of-force investigation to be completed and input into PRMS, this reconciliation is only conducted on a yearly basis.<sup>11</sup>

To facilitate more frequent reconciliations between e-LOTS and PRMS, the Office of Inspector General recommends that any changes to the use-of-force cases in the

<sup>&</sup>lt;sup>11</sup> A time lag exists between the date of a use-of-force and the time the force case is reviewed and sent to the Discovery Unit for final processing thus delaying the reconciliation process. The Department indicated that although there are procedures in place to reconcile e-LOTS and PRMS, a reconciliation has not been conducted for 2018. The Department reports that it plans on conducting a reconciliation in the near future.

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e-LOTS database be immediately communicated (e.g. via email) to the Risk Management Bureau so those changes can be concurrently updated in PRMS. This will ensure that the use-of-force totals and categories of force recorded in e-LOTS and PRMS are synchronized in near real-time and will allow for weekly and monthly reconciliations between e-LOTS and PRMS.

#### **Use-Of-Force Tracking Audit**

The Office of Inspector General conducted an audit of the Sheriff's Department's interim use-of-force tracking procedures to test their effectiveness in ensuring consistent treatment of relevant data. The Office of Inspector General audit consisted of four tests to assess the consistency across the Sheriff's Department's use-of-force totals by determining whether use-of-force information was updated and reconciled in real-time. The Office of Inspector General audited the reported use-of-force incidents from January 1, 2018, through and including December 31, 2018, which represents a full year of data since the implementation of the Department's interim procedures. The four tests are set forth below:

- 1. Are changes made to the categories of force in the e-LOTS database reflected in the MFCR in real time?
- 2. Is the running use-of-force total listed in the Force Synopsis spreadsheet reflected in the running use-of-force total in the MFCR from the e-LOTS database?
- 3. Are the use-of-force totals and categories of force recorded in the Force Synopsis equal to the totals in the e-LOTS database for the 2018 calendar year?
- 4. Are the use-of-force and the category of force totals in e-LOTS reconciled with the totals in PRMS?

Our evaluation of the MFCR revealed that changes made to the categories of force in e-LOTS were immediately updated and reflected in the MFCR in real-time.

In determining whether the running total of the use-of-force incidents in the Force Synopsis spreadsheet was reconciled by CSS on a daily basis and reflected in the running total of uses-of-force in the e-LOTS MFCR, we randomly selected four days in November 2018. For each day, we compared the total force incidents in the MFCR to

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the information in the Force Synopsis spreadsheet and found a net difference of one case that was recorded in e-LOTS but was not recorded in a Force Synopsis spreadsheet. As such, use-of-force incidents appear to be updated daily to e-LOTS.

Our comparison of the 2018 use-of-force yearly totals between the Force Synopsis, and the e-LOTS MFCR revealed that there was a difference of five cases (less than one-half of a percent of the use-of-force cases reported during the period) between both reports. We observed slightly higher variances between the categories of force used in the Force Alerts/Force Synopsis and those used in the e-LOTS MFCR. Although we expect that the total <u>number of force incidents</u> between the two tracking mechanisms to be identical or close to identical, we do not expect the numbers within each <u>category of force</u> to be the same because the Force Alerts/Force Synopsis are not (and were never intended to be) updated with information from later changes in categories made in e-LOTS. Force Alerts/Force Synopsis were only intended to serve as a preliminary notification of a use-of-force.

Our reconciliation of the use-of-force data between e-LOTS and PRMS revealed a difference of five cases (2,118 vs. 2,113 respectively) or less than one-half of a percent (.023%) between both data systems. We observed greater variance in the categories of force totals. The variances in category of force ranged from 0.2% to 4.0%.

After conducting our audit of the Sheriff's Department's tracking of use-of-force totals, we are confident that the use-of-force totals being generated from e-LOTS are timely and consistent with other data sources (see Exhibit 1, Use-of-Force Tracking Audit Report). However, when it comes to reporting the categories of the force used (Category 1, 2, 3, and NCI's), we are less confident since these numbers are not currently being reconciled to any other data source.<sup>13</sup>

However, if the Sheriff's Department implemented a process whereby any changes to the use-of-force categories in the e-LOTS system were immediately transmitted to the Discovery Unit for input into PRMS, then the use-of-force categories recorded in PRMS would match e-LOTS in near real-time. This would provide CSS with a separate data system (PRMS) against which it could reconcile its e-LOTS force categories at least on a monthly basis.

<sup>&</sup>lt;sup>12</sup> This represents an immaterial difference in comparison to the overall totals being reported in both reports.

<sup>&</sup>lt;sup>13</sup> The Sheriff's Department indicated that although there are procedures in place to reconcile e-LOTS and PRMS, which would include a reconciliation of the categories of force, such a reconciliation has not been conducted for 2018.

#### **INMATE ASSAULT REPORTING**

The July 2017 Jail Violence Tracking report found that custody facilities were not submitting crime reports in a timely manner (report lag) which may have resulted in the underreporting of inmate-assault data. Further, inmate-assault totals were not updated with information from late crime reports, resulting in the publication of inmate-assault totals which differed from those that had been previously published for the same time period. Lastly, we also found that the Sheriff's Department did not generally track multiple assaults occurring in one incident, again potentially resulting in an underreporting of individual assaults.

To address some of the issues outlined in the July 2017 report, the Sheriff's Department implemented substantial changes to its inmate-assault tracking process:

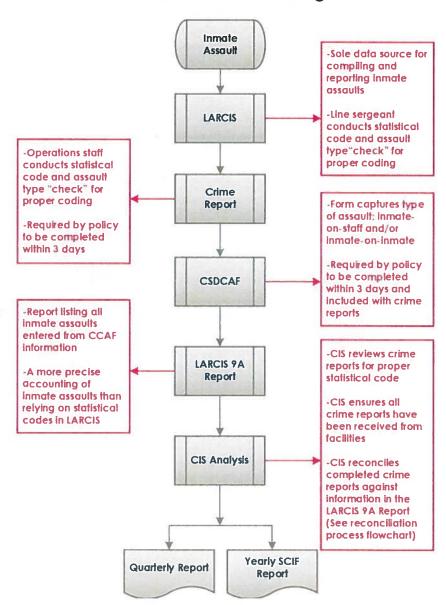
- Designated the Los Angeles Regional Crime Information System (LARCIS) as the sole data source for compiling and reporting inmate-assaults to promote greater reliability and consistency;
- Eliminated the FAST program and internal trackers as sources of published inmateassault data:
- Created the Custody Services Division Crime Analysis Form (CSDCAF) in LARCIS to more reliably track inmate-on-inmate and inmate-on-staff assaults; and
- Created the LARCIS [9A] exception report that enables the Sheriff's Department to compile all inmate-assaults recorded in crime reports.

In addition, the Sheriff's Department changed policies, issued training bulletins, and conducted training to ensure that all crime reports and associated supplemental forms are submitted on time or in a reasonable amount of time if deferred.

Custody Division policy was updated to require crime reports including the CSDCAF be submitted within three business days. Any deferred reports must now be completed the following calendar day that the deputy is on duty and requires approval by a watch sergeant. The Department has also implemented custody-wide training on LARCIS data entry and the proper completion of any required forms, including crime reports and their associated CSDCAF's. The Sheriff's Department's revised inmate-assault tracking process is set forth in the chart below.

<sup>&</sup>lt;sup>14</sup> Custody Division Manual 4-01/000.00-Crime Reporting Procedures.

# **Interim Inmate Assault Tracking Procedures**



When an inmate-assault occurs, custody staff generate an Uniform Report Number (URN). <sup>15</sup> Each URN is a unique number that is used to identify the incident and is

<sup>&</sup>lt;sup>15</sup> See MPP 4-02/010.00 Uniform Report Number. A "Uniform Report Number" (URN) is a 15-digit number used to classify and compile statistical information.

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entered on all crime reports and supplemental reports and forms concerning that incident. All information relating to the assault incident is filed under the URN in the LARCIS system. <sup>16</sup> Custody personnel prepare a crime report and all related supplemental forms including the CSDCAF and submits them to a line sergeant for review. The line sergeant reviews the crime report and supplemental forms to ensure that the incident was properly documented. The line sergeant also verifies that the statistical codes used to describe the assault incident accurately reflect the facts contained in the report.

The CSDCAF is a supplemental checkbox form that identifies the actions of the suspect(s), location of the incident, and additional information related to the suspect(s) and victim(s). The CSDCAF is an important link in the inmate-assault tracking process because it records the type of assault (e.g. inmate-on-inmate or inmate-on-staff) involved in an incident.<sup>17</sup>

The line sergeant reviews the crime report and submits the report to a watch commander/sergeant that same day for review. Any crime reports that are not completed on the date of occurrence are now required to be completed and submitted within three days of the incident. After reviewing the crime report, the watch commander/sergeant forwards the report to the Operations Unit (Operations). Operations staff enters assault-related data into LARCIS and verifies that the correct statistical codes were used to classify the crime(s) described in the crime report. Operations staff then identifies any late crime reports and runs a data exception report to identify any information not properly input into LARCIS. The report is then sent to Custody Investigative Services (CIS)<sup>18</sup> for investigation.

#### Reconciliation of Inmate Assault Reports

Upon receiving a case from custody operations, a CIS supervisor reviews the crime report for the correct charge and statistical coding. Every quarter, CIS generates a LARCIS 9A exception report which lists all inmate-assaults and related information from the crime reports and CSDCAF supplemental forms. CIS compares the information from the LARCIS 9A report to the crime reports received from the custody facilities to ensure that the information entered into LARCIS matches what is written in the crime reports.

<sup>&</sup>lt;sup>16</sup> LARCIS records a summary of all pertinent information contained within a crime report including but not limited to the following: crimes committed; involved people; crime analysis and modus operandi information; and case management/assignment information.

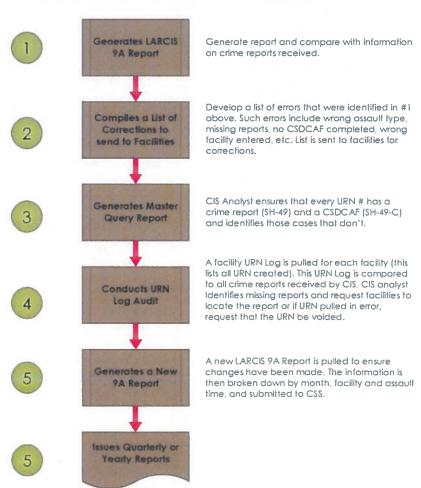
<sup>&</sup>lt;sup>17</sup> Exhibit 6, Custody Services Division Crime Analysis Form (CSDCAF).

<sup>&</sup>lt;sup>18</sup> CIS-Custody Investigative Services is a sub-unit of the Custody Support Services Bureau tasked in part with verifying the Sheriff's Department's inmate-assault numbers prior to publication.

CIS then generates a list of incorrect or missing data entries and follows up with the custody facilities to correct any inaccuracies.

CIS also runs a Master Query Report to ensure that every URN has an associated crime report and CSDCAF. CIS compares a log of all URNs created by a custody facility and matches the log to the crime reports from that facility to identify missing reports, duplicate URNs for the same incident, or URNs that should be voided. At the end of this process, CIS has completed multiple checks to ensure the inmate-assault totals in LARCIS are consistent and current. CIS generates a final LARCIS 9A exception report to verify that all the identified inaccuracies in the crime reports, LARCIS records, and custody facilities records have been corrected. This process is set forth in the chart below:

# Inmate Assaults Reconciliation Process



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After CIS completes the reconciliation process of inmate-assault information, the LARCIS 9A exception report becomes the sole source of published inmate-assault totals. These totals are transmitted to CSS for publication to management on a quarterly and annual basis.

### Inmate Assault Tracking Audit

The Office of Inspector General conducted an audit to determine whether the Sheriff's Department's interim procedures to track inmate-assaults were yielding consistent and replicable results in compliance with the Sheriff's Department's mandates. The Office of Inspector General reviewed the time-period of January 1, 2018 through December 31, 2018, because this time-period represented a full year in which the Sheriff's Department's interim procedures have been in effect. The five objectives of this audit are set forth below:

- 1) Review the consistency of the Sheriff's Department's published inmate-assault data by compiling an independent data set from the Sheriff's Department's 2018 federal Uniform Crime Reporting (UCR)<sup>19</sup> data and comparing it with inmate-assault data published or presented by the Department in other forums.
- 2) Determine whether inmate-assault crime reports are being submitted with the associated CSDCAF form to ensure that inmate-assault data is being captured as required by Department policy.
- Determine if the boxes for "Assault Type" are being checked on the CSDCAF to ensure that all available inmate-assault data is being entered into the LARCIS database.
- 4) Verify whether the appropriate "Assault Type" (inmate-on-inmate or inmate-on-staff) is being checked on the CSDCAF based on the facts set forth in the underlying crime reports to ensure that the correct assault type is properly entered into the LARCIS database.

<sup>&</sup>lt;sup>19</sup> The FBI's Uniform Crime Reporting Program is a nationwide, cooperative statistical effort of nearly 18,000 city, university and college, county, state, tribal, and federal law enforcement agencies voluntarily reporting data on crimes brought to their attention. The Sheriff's Department's UCR data is published on its website. The OIG downloaded the Sheriff's Department's 2018 UCR data from <a href="http://shq.lasdnews.net/CrimeStats/CAASS/desc.html">http://shq.lasdnews.net/CrimeStats/CAASS/desc.html</a> on February 14, 2019.

5) Determine if inmate-assault reports are being completed within three days as required by the Sheriff's Department's policy to ensure that all inmate-assault incidents are captured when running the LARCIS 9A report used to count inmate-assaults.

The Office of Inspector General conducted an independent download of the Sheriff's Department's UCR data and compiled the total number of reported inmate-assaults for 2018. We then compared this total to the totals published by the Sheriff's Department in three other publications covering the same time period. When compared to the UCR data totals, the Office of Inspector General Report and Sheriff's press conference<sup>20</sup> totals differed only by one incident. When we compared with the UCR data to the Sheriff's Department's internal Quarterly Report totals, we observed the same overall totals with a small variance in the type of assaults.<sup>21</sup> Likewise, small variances were observed between the Sheriff's Department's published inmate-assault totals by type and the totals reflected in its internal Quarterly Reports. This is an indication that the interim processes that have been put in place were effective in yielding consistent and replicable results during the period we assessed. We are confident this was accomplished due to changes which are described more fully above.

We determined that one hundred percent of the sampled assault crime reports (95 of 95 reports)<sup>22</sup> that we reviewed were submitted with the associated Custody Services Division Crime Analysis Form (CSDCAF). This is another indication that all required inmate-assault data is being captured for entry into the LARCIS database. We also found that in ninety-seven percent of the crime reports sampled (92 of 95 reports) the "Assault Type" (inmate-on-inmate or inmate-on-staff) was checked on the CSDCAF to ensure that the categories of inmate-assaults were being captured for entry into the LARCIS database.

We further found that of the ninety-two CSDCAFs that contained a checked Assault Type box, one-hundred percent (92 of 92 reports) of the CSDCAF's had an "Assault Type" checked consistent with the facts set forth in the underlying crime reports. This is a strong indication that the correct assault types are being properly entered and tracked in the LARCIS database.

<sup>&</sup>lt;sup>20</sup> Sheriff Villanueva's press conference on January 30, 2019.

<sup>&</sup>lt;sup>21</sup> This variance may have been the result of a re-classification of incident after the quarterly was issued.

<sup>&</sup>lt;sup>22</sup> The OIG utilized a statistically valid sample that was selected from the UCR data to measure those objectives. From a total population of 4,208 assault incidents, a stratified sample size of 95 inmate-assault cases were randomly selected for evaluation (82 inmate-on-inmate, 13 inmate-on-staff).

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Lastly, we found that one hundred percent of the sampled inmate-assault reports (95 of 95 reports) were completed within three days as required by the Sheriff's Department's policy. This is another strong indication that the "report lag" in crime report preparation noted in the July 2017 Jail Violence Tracking report has been minimized and all inmate-assault incidents are likely being captured by the LARCIS 9A report for subsequent publication by the Sheriff's Department.

However, the issue of "lag time" in the inmate-assault tracking process has not been totally eliminated. Although the Sheriff's Department completes the crime reports and entries into LARCIS in a timely manner, there is still a delay before they are sent to CIS to conduct its reconciliation process. For each of the 95 sampled reports, we obtained the date that the crime occurred and compared it to the date the report was submitted to CIS and found that the average lag time was about eight days; a range of zero days for the lowest to 54 days for the highest. Although there is no policy that addresses time within which it is required to submit the completed reports to CIS, flowcharts provided to the Office of Inspector General indicate that these reports should be forwarded to CIS no later than seven days from the day of the incident. The timely submission of completed crime reports to CIS for review is essential to the process of reconciling inmate-assault totals for accuracy.

#### Inmate Assault Tracking Audit Conclusion

A comparison of an inmate-assault data set prepared by the Office of Inspector General to three other inmate-assault totals published by the Sheriff's Department at different times and in different formats showed very little to no variance. This is evidence that the interim procedures put into place by the Sheriff's Department have likely been effective. The interim procedures require that all crime reports include a CSDCAF, be submitted in a timely fashion and that the boxes in the CSDCAF be checked with the appropriate type of inmate-assault.

Overall, the Sheriff's Department's efforts to produce consistent and replicable inmate-assault data were successful during the period we reviewed. We believe this was achieved due to having multiple checks in their review processes, the reliance on a single source (LARCIS) of published data, changes to the LARCIS system, and the continuing training of their staff (see Exhibit 2, Inmate Assault Tracking Audit Report). However, our audit did reveal one significant reliability issue that carried over from our July 2017 Jail Violence Tracking report.

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We identified in our July 2017 Jail Violence Tracking report a reliability problem that has the potential to underreport inmate-assaults. For example, if an incident involved three victims in an inmate-on-inmate-assault, the current reporting process would only indicate one inmate-on-inmate-assault and not the three that actually occurred. The Department reported that LARCIS only has the ability to record multiple victims in incidents involving "aggravated assaults." LARCIS cannot record multiple victims classified as non-aggravated. Furthermore, even in incidents involving aggravated assaults, LARCIS cannot differentiate between inmate-on-inmate and inmate-on-staff assaults.

In 2018, there were a total of 3,514 non-aggravated assaults, which constitutes approximately eighty-four percent of the 4,208 assaults reported. This represents a significant underreporting of inmate-assault victims. The Sheriff's Department reported that it plans to modify LARCIS to have the ability to record and report the total number of victims of all inmate-assaults broken down by type for both aggravated and non-aggravated assaults.<sup>25</sup>

#### **CLOSING SUMMARY**

Throughout this review process, custody management and staff have worked collaboratively with the Office of Inspector General. The Sheriff's Department has made substantial improvements to its system of tracking and reporting use-of-force and inmate-assault totals. In particular, the Custody Support Services Bureau and Custody Investigative Services have spearheaded a number of changes in policy and procedure that have resulted in a marked improvement in the consistency, reliability, and timeliness of the Sheriff's Department's reporting of jail violence totals. However, the remaining issues of tracking the types and categories of jail violence should be addressed to ensure that both the Sheriff's Department and the public has access to the most consistent and replicable information possible. The recommendations set forth above are tailored to further refine the Sheriff's Department's data-collection processes for tracking jail violence and to increase reliability.

<sup>&</sup>lt;sup>23</sup> Aggravated assaults are defined as "an unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury." FBI UCR Program Part I Crimes -- <a href="https://www2.fbi.gov/ucr/cius">https://www2.fbi.gov/ucr/cius</a> 04/appendices/appendix 02.html

Defined as "assaults and attempted assaults which are not of an aggravated nature and do not result in serious injury to the victim". FBI UCR Program Part II Crimes-Other assaults (simple) -- <a href="https://www2.fbi.gov/ucr/cius">https://www2.fbi.gov/ucr/cius</a> 04/appendices/appendix 02.html

<sup>&</sup>lt;sup>25</sup> CSS reported that the status of this request is still pending with the LARCIS team and there is no new update since the request was submitted.

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Another issue that remains is that CSS is still not the sole source for data compilation and verification as recommended by the July 2017 Jail Violence Tracking report. The Sheriff's Department reported that it is working with the Department's Data Systems Bureau on a long-term solution which includes the development of a single unit capable of being the sole source of collection, compilation, verification, and dissemination.

As stated in our July 28, 2018 report back, the ultimate fiscal and/or budgetary implications of upgrading the Sheriff's Department information technology data systems cannot be assessed at this time. This analysis is further complicated by the fact that the Sheriff's Department's Data Systems Bureau is currently revising plans/policies to upgrade its information technology systems. The Office of Inspector General will continue to monitor and report on the Sheriff's Department's progress towards a long-term data systems solution.

#### **RECOMMENDATIONS**

### <u>Use-of-Force Tracking Recommendations</u>

Based on our review of the Sheriff's Department's interim procedures for tracking custody use-of-force totals, the Office of Inspector General makes the following recommendations:

- Any change to the categorization of a use-of-force in the e-LOTS database, should be immediately communicated to the Risk Management Bureau Discovery Unit so those changes can be timely updated in PRMS. This will ensure that the use-of-force totals and categories of force recorded in e-LOTS and PRMS are consistent;
- 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; and
- 3. 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.

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### Inmate Assault Tracking Recommendations

Based on our review of the Sheriff's Department's interim procedures for tracking custody inmate-assault totals, the Office of Inspector General makes the recommendations set forth below:

- The Sheriff's Department should develop an <u>automated</u> LARCIS exception report that identifies all crime reports that do not have a CSDCAF attached. Currently, 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.
- 2. 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.
- 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.

MH:DP:js

#### **Enclosures**

c: Alex Villanueva, Sheriff
 Sachi A. Hamai, Chief Executive Officer
 Celia Zavala, Executive Officer
 Mary C. Wickham, County Counsel
 Brian Williams, Civilian Oversight Commission

SECOND REPORT BACK ON THE LOS ANGELES COUNTY SHERIFF'S DEPARTMENT'S PLAN TO UPGRADE THE DATA SYSTEMS USED TO TRACK JAIL VIOLENCE

# **EXHIBIT 1**

LOS ANGELES COUNTY
OFFICE OF INSPECTOR GENERAL

April 2020

# Audit of the Interim Procedures Implemented by the Custody Division to Improve the Use-of-Force Data Collection Methodologies to Yield Consistent and Replicable Data

# **Audit Objectives**

To ensure the consistency and replicability of the Department's use-of-force data by determining whether use-of-force totals and categories of force used are updated and reconciled to the Department's force tracking data systems in real-time. The four audit objectives of this audit are set forth below:

- 1. Determine whether changes made to the categories of force in the e-LOTS database were reflected in the MFCR in real time.
- Determine whether the running use-of-force totals listed in the Force Synopsis spreadsheet were reflected in the running total uses-of-force in the MFCR from the e-LOTS database.
- 3. Determine whether the use-of-force totals and categories of force recorded in the Force Synopsis matched the totals in the e-LOTS database for the 2018 calendar year.
- 4. Determine whether the use-of-force totals and the category of force totals in e-LOTS were being reconciled with the totals in PRMS.

# Scope of Audit

The OIG audited Custody use-of-force tracking from January 1, 2018, through December 31, 2018. This time period represented a full year of use-of-force data collection since the implementation of the Department's interim procedures to track use-of-force totals.

# Audit Objective #1

Determine whether changes made to the categories of force in the e-LOTS database were reflected in the MFCR in real-time.

#### **Procedures**

A current MFCR was generated on April 11, 2019. Then OIG staff randomly selected five use-of-force cases that occurred in the months of January, February, March, April and May of 2018. We then requested that custody personnel change the selected use-of-force cases to a different category of force. We immediately generated another MFCR and determined whether the test changes were reflected in the new report. We then restored the cases to their original

form and generated a MFCR to confirm that the cases had reverted to their original force category classifications.

#### Results

Our test revealed that one-hundred percent of the test changes were accurately reflected on the MFCR in real-time. When we changed the test cases back to their original force category classifications, one-hundred percent of the change backs were also accurately reflected in a confirmation copy of the MFCR.

# Audit Objective #2

Determine whether the running use-of-force totals listed in the Force Synopsis spreadsheet were reflected in the running total uses-of-force in the MFCR from the e-LOTS database.

#### **Procedures**

We randomly selected four days in November 2018 to perform this test. For each day, we compared the running use-of-force totals in the MFCRs to the running totals in the Force Synopsis spreadsheets.<sup>1</sup> We then reconciled these two reports by adding the total incidents in the Force Synopsis to the previous day's totals in the MFCR and comparing the following day's beginning totals in the MFCR and noting any differences as represented by the following tables:

	November 6, 2018						
		NCI	Cat1	Cat2	Cat3	Total	
Α	Beginning totals per MFCR-November 5 <sup>2</sup>	507	1036	295	5	1843	
В	Add: Force Synopsis Incidents	2	1	1	0	4	
С	Total (A+B)	509	1037	296	5	1847	
D	Total Per MFCR-November 6	509	1035	298	5	1847	
Ε	Difference (C-D)	0	2	-2	0	0	

	November 7, 2018						
		NCI	Cat1	Cat2	Cat3	Total	
Α	Beginning totals per MFCR-November 6	509	1035	298	5	1847	
В	Add: Force Synopsis Incidents	0	4	0	0	4	
С	Total (A+B)	509	1039	298	5	1851	
D	Total Per MFCR-November 7	510	1037	299	- 5	1851	
E	Difference (C-D)	-1	2	-1	0	0	

<sup>&</sup>lt;sup>1</sup> The Force Synopsis reports were provided by the Department on April 3, 2019.

<sup>&</sup>lt;sup>2</sup> A five-day sample of MFCR's was necessary to establish the beginning totals for November 5, 2018.

	November 8, 2018						
		NCI	Cat1	Cat2	Cat3	Total	
Α	Beginning totals per MFCR-November 7	510	1037	299	5	1851	
В	Add: Force Synopsis Incidents	2	2	1	0	5	
С	Total (A+B)	512	1039	300	5	1856	
D	Total Per MFCR-November 8	511	1039	300	5	1855	
Е	Difference (C-D)	1	0	0	0	1	

	November 9, 2018						
		NCI	Cat1	Cat2	Cat3	Total	
Α	Beginning totals per MFCR-November 8	511	1039	300	5	1855	
В	Add: Force Synopsis Incidents	3	3	0	0	6	
С	Total (A+B)	514	1042	300	5	1861	
D	Total Per MFCR-November 9	515	1043	300	5	1863	
Ε	Difference (C-D)	-1	-1	0	0	-2	

	Overall Results for Test Period				
		Total			
Α	Beginning Per MFCR-November 5	1843			
В	Add: Force Synopsis Incidents	19			
С	Total (A+B)	1862			
D	Total Per MFCR-November 9	1863			
Ε	Difference (C-D)	-1			

#### Results

As to the Department's tracking of running use-of-force totals, there was a net difference of <u>one</u> case that was recorded in e-LOTS but was not recorded in a Force Synopsis spreadsheet. As such, use-of-force incidents appear to be updated daily to the MFCR.

# Audit Objective #3

Determine whether the use-of-force totals and categories of force recorded in the Force Synopsis matched the totals in the e-LOTS database for the 2018 calendar year.

#### **Procedures**

We reviewed all uses-of-force occurring in custody facilities for 2018.<sup>3</sup> We compiled the Force Synopses for each month of 2018 and tabulated the total uses-of-force by categories of force. We downloaded a listing of all 2018 use-of-force cases from e-LOTS and tabulated the total uses-of-force by category of force.<sup>4</sup> We then compared the Force Synopsis totals to the totals from the e-LOTS database.

#### Results

Overall there was a difference of five cases or less than half a percent (0.2%) in the overall use-of-force totals between in e-LOTS and the Force Synopses. However, there was a larger variance in the categories of force used as shown by the following table:

Category of Force	Force Synopsis Category Totals	e-LOTS Category Totals	Difference
CAT 1	1,218	1,191	27
CAT 2	336	341	-5
CAT 3	5	5	0
NCI	559	576	-17
Totals	2,118	2,113	5

The category of force used recorded in the Force Synopses varied from the category recorded in e-LOTS in 49 cases (2.3%). However, some variance in the categories of force totals reported between the Force Synopses and e-LOTS is to be expected.

During the force investigation and review process, the category of force used may increase or decrease depending on the facts of each case. CSS updates e-LOTS with any changes to the category of force used. Department staff explained that CSS does not update the daily Force Alerts or the Force Synopsis spreadsheet with subsequent changes to the category of force used in an incident. Force Alerts and the Force Synopsis are only meant to be a record of preliminary details of an incident to alert management of a use-of-force. They are not meant to be sources of published use-of-force data. As such, this variance does not affect the accuracy of the Department's published use-of-force statistics.

# Audit Objective #4

Determine whether the use-of-force totals and the category of force totals in e-LOTS were being reconciled with the totals in PRMS.

<sup>&</sup>lt;sup>3</sup> This audit reviewed use-of-force statistics for all LASD large custody facilities and the Los Angeles County Medical Center

<sup>&</sup>lt;sup>4</sup> Data downloaded from e-LOTS on March 14, 2019.

Once the Division Chief reviews and signs off on a completed use-of-force investigation, it is sent to the Risk Management Bureau's Discovery Unit for final processing. During final processing, the Discovery Unit enters any updated details of the force incident into PRMS. As such, the use-of-force totals and categories of force recorded in PRMS should match the totals in the e-LOTS database.

#### Procedures

We downloaded a list of all 2018 use-of-force cases from PRMS and tabulated that list by category of force. We then compared this list to the previously generated listing 2018 use-of-force cases from e-LOTS (Objective #3).

#### Results

We observed a difference of five cases or less than half a percent (0.2%) of the overall totals between PRMS and e-LOTS. We also saw a 1.6%, 4.0% and 0.2% differences in force Categories 1, 2 and NCI respectively as shown by the following table:

Category	PRMS	e-LOTS	Difference	% Difference
CAT 1	1,210	1,191	19	1.6%
CAT 2	328	341	-13	4.0%
CAT 3	5	5	0	0.0%
NCI	575	576	-1	0.2%
Totals	2,118	2,113	5	0.2%

Although there is a high degree of correlation between the PRMS and e-LOTS totals, the Department reports 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 be to completed and input into PRMS. However, if the Department implemented a process where any changes to the use-of-force categories in the e-LOTS system were immediately transmitted via an e-mail message to the Discovery Unit for input into PRMS, then the use-of-force categories recorded in PRMS would match e-LOTS in near real-time. This would provide CSS with a separate data system (PRMS) to check its e-LOTS force category totals against. The Department would then be able to reconcile e-LOTS and PRMS at least on a monthly basis.

#### CONCLUSION

After conducting an audit of the Department's tracking of use-of-force totals, we believe that the use-of-force totals being generated from e-LOTS are timely and consistent. However, when it comes to reporting the various categories of force (Category 1, 2, 3 and NCI's), we are less confident since these numbers are not currently being reconciled to any other system.

Our evaluation of the MFCR revealed that changes in e-LOTS are immediately updated and reflected in the MFCR in real-time. As a result, we are reasonably confident that the MFCR produces up-to-date information.

Our comparison of the 2018 use-of-force totals in the Monthly Force Synopsis and MFCR revealed that there was less than half of a percent difference between both reports. However, we observed a slightly higher variance in the totals of the force categories. Although we expect that the total number of force incidents between the two be identical or close to identical, we do not expect the categories of force between the two to be the same since Force Alerts/Force Synopses were never intended to be updated with later changes in e-LOTS. They were only intended to serve as a preliminary notification of a use-of-force.

Our reconciliation of the use-of-force data between e-LOTS and PRMS revealed a difference of five cases (2118 vs. 2113 respectively) or less than half of a percent between both data systems. Again, we observed greater variance in the categories of force totals. The Department indicated that although there are procedures in place to reconcile e-LOTS and PRMS, a reconciliation has not been conducted for 2018. Although the Department reports that it plans on conducting a reconciliation in the near future, no specific date was provided.

Although the Department has the ability to report consistent and up-to-date use of force totals, it does not have the ability to generate any other type of data associated with use-of-force incidents. For example, the Department still does not have the ability to generate a report that lists uses-of-force by method of force used such as Taser or OC Spray or the location within the facility that the use-of-force occurred. This information could likely be helpful in identifying risk management issues or with the allocation of resources.

One promising solution that would help with this is the full implementation of a newly created online platform to complete the SH-438 "Use of Force Report." As of June 14, 2017, all custody personnel are required to complete this report after each use-of-force. This online platform can display a variety of metrics and data that would be helpful to management such as:

- ✓ Month, Day, Shift and Time of Occurrence
- ✓ Age, Race and Classification of the inmate
- ✓ Category, Method and Location of the Use of Force

According to the Department this online application has been unstable which has led to inconsistent use by Custody staff. Furthermore, this application does not have the current capacity to report Non-Categorized Incidents (NCI)<sup>6</sup> uses-of-force.

<sup>&</sup>lt;sup>5</sup> This represents an immaterial difference in comparison to the overall totals being reported in both reports.

<sup>&</sup>lt;sup>6</sup> NCI uses of force is a type of force not classified as a Category 1, 2, or 3 use of force and involves a low-level use of force where there is no injury or complaint of pain from the inmate.

### **RECOMMENDATIONS**

Based on our review of the Department's interim procedures for tracking custody use-of-force totals, the OIG makes the following recommendations

- 1. It is recommended that any changes to use-of-force categories in the e-LOTS database be immediately communicated to the Risk Management Bureau so those changes can be concurrently updated in PRMS. This will ensure that the use-of-force totals and categories of force recorded in e-LOTS and PRMS are in sync.
- It is recommended that the Risk Management Bureau conduct quality control checks of any updates to PRMS files to ensure that force packages are updated in PRMS with the most current information.
- 3. It is recommended that CSS 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 between both systems. This is critically important as PRMS is the Department's official repository of personnel information and must reflect the most current information.

SECOND REPORT BACK ON THE LOS ANGELES COUNTY SHERIFF'S DEPARTMENT'S PLAN TO UPGRADE THE DATA SYSTEMS USED TO TRACK JAIL VIOLENCE

# **EXHIBIT 2**

LOS ANGELES COUNTY
OFFICE OF INSPECTOR GENERAL

April 2020

# Audit of the Interim Procedures Implemented by the Custody Division to Improve the Inmate Assault Tracking Data Collection Methodologies to Yield Consistent and Replicable Data

# **Audit Objectives**

The OIG conducted an audit to determine whether the Department's interim procedures implemented to track inmate assault totals were yielding consistent replicable results in compliance with Custody Division Manual (CDM) mandates. The five objectives of this audit are set forth below:

- 1) Review the consistency of the Department's published inmate assault data by compiling an independent data set from the Department's 2018 federal Uniform Crime Reporting data and comparing it with inmate assault data published or presented by the Department in other forums<sup>1</sup>.
- Determine whether inmate assault crime reports are being submitted with the
  associated Custody Services Division Crime Analysis Form (CSDCAF) form to ensure that
  inmate assault data is being captured as required by Department policy.
- 3) Determine if the boxes for "Assault Type" are being checked on the CSDCAF to ensure that all inmate assault data is being entered into the LARCIS database.
- 4) Verify whether the appropriate "Assault Type" (inmate-on-inmate or inmate-on-staff) is being checked on the CSDCAF based on the facts set forth in the underlying crime reports to ensure that the correct assault type is properly entered into the LARCIS database.
- 5) Determine if inmate assault reports are being completed within three days as required by Department policy to ensure that all inmate assault incidents are captured when running the LARCIS 9A report used to count inmate assaults.

# Scope of Audit

The OIG reviewed the time-period of January 1, 2018, through December 31, 2018 because this time-period represented a full year during which the Department's interim procedures have been in effect.

<sup>&</sup>lt;sup>1</sup> As provided to the OIG, presented in a press conference and provided to management in quarterly reports.

# Audit Objective #1

Review the consistency of the Department's published inmate assault data by compiling an independent data set from the Department's 2018 federal Uniform Crime Reporting data and comparing it with inmate assault data published or presented by the Department in other forums.

#### **Procedures**

We downloaded the Department's official crime data for the 2018 year which was reported to the U.S. Federal Bureau of Investigation's Uniform Crime Reporting (UCR) Program.<sup>2</sup> We selected all crime data occurring at custody facilities. We then used Departmental statistical codes to select all inmate-on-inmate and inmate-on-staff assaults, 4 arriving at a total of 3,631 for inmate-on-inmate assaults, and 577 for inmate-on-staff assaults for a total of 4,208 assaults. We compared these results to the following three published inmate assault totals issued by the Department in the following forums:

- Provided to the Office of Inspector General for its quarterly report.<sup>5</sup>
- Presented at Sheriff Alex Villanueva's Press Conference.<sup>6</sup>
- Quarterly Reports provided by CIS to management.<sup>7</sup>

#### Results

When compared to the UCR data totals, the OIG report, and Sheriff's press conference totals differed only by one incident. When we compared the UCR data to the Department's internal Quarterly Report totals, we observed the same overall totals with a small variance in the type of assaults. Likewise, small variances were observed between the Department's published inmate assault totals by type and the totals reflected in its internal Quarterly Reports. Our results are presented in the chart below.

<sup>&</sup>lt;sup>2</sup> The FBI's Uniform Crime Reporting (UCR) Program is a nationwide, cooperative statistical effort of nearly 18,000 city, university and college, county, state, tribal, and federal law enforcement agencies voluntarily reporting data on crimes brought to their attention. The Department's UCR data is published on its website. OIG downloaded the Department's 2018 UCR data from http://shq.lasdnews.net/CrimeStats/CAASS/desc.html on February 14,

<sup>&</sup>lt;sup>3</sup> Including Men's Central Jail (MCJ), Inmate Reception Center (IRC), Pitchess Detention Center (PDC) South, PDC East, PDC North, North (NCCF), Century Regioal Detention Facility (CRDF) and Twin Towers Correctional Facility (TTCF) using Reporting District (RD) #5100, 5120, 5160, 5620, 5630, 5640, 5700 and 5800 respectively.

<sup>&</sup>lt;sup>4</sup> As outlined in Custody Investigative Services (CIS) Training Bulletin-February 7, 2018. <sup>5</sup> Los Angeles County Office of Inspector General's Report-Reform and Oversights Efforts: Los Angeles County

Sheriff's Department-December 2018.

<sup>&</sup>lt;sup>6</sup> Sheriff Villanueva's press conference on January 30, 2019.

<sup>&</sup>lt;sup>7</sup> Department internal quarterly reports issued by CIS after the close of each quarter. <sup>8</sup> This variance may have been the result of a re-classification of incident after the quarterly was issued.

Туре	UCR Data	OIG Report	Press Conference	Internal Quarterlies
Inmate-on-inmate	3,631	3,632	3,632	3,645
Inmate-on-staff	577	577	577	563
Totals	4,208	4,209	4,209	4,208

In sum, the Department's published inmate assault totals for 2018 appear to be consistent.

For the following objectives #2 through #5, a statistically valid sample was selected from the UCR data to measure those objectives. From a total population of 4,208 assault incidents, a stratified sample size of 95 inmate assault cases were randomly selected for evaluation (82 inmate-on-inmate, 13 inmate-on-staff).

# Audit Objective #2

Determine whether inmate assault crime reports are being submitted with the associated Custody Services Division Crime Analysis Form (CSDCAF) to ensure that all inmate assault data is captured as required by Department policy.<sup>9</sup>

#### Procedures

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. We sampled 95 crime reports to determine whether there was an associated CSDCAF attached to each report as required by policy. The absence of a CSDCAF from a crime report would result in the underreporting of inmate assaults.

#### Results

One hundred percent (95 out of 95) of the sampled inmate assaults reports included a CSDCAF as summarized in the table below:

Objective #2 Results Type of Assault	Met Standard
Inmate-on-inmate	82
Inmate-on-staff	13
Total	95
% of Crime Reports with a CSDCAF attached	100%

<sup>&</sup>lt;sup>9</sup> See MPP § 4-01/020.40 and MPP § 4-01/000.00. <sup>10</sup> See, MPP § 4-01/020.40

# Audit Objective #3

Determine whether the boxes for "Assault Type" are being checked on the CSDCAF to ensure that all inmate assault data is captured for entry into the LARCIS database.

#### **Procedures**

For each of the 95 sample cases, we examined the CSDCAF to determine whether the appropriate boxes were checked for "Assault Type" (inmate-on-inmate or inmate-on-staff). If an "Assault Type" box is not checked on a CSDCAF, the assault is not reflected in the LARCIS 9A exception report and therefore not reported by CIS.

#### Results

The "Assault Type" box was checked in ninety-seven percent (92 of 95) of the sampled inmate assaults cases as set forth in the following table:

Objective #3 Results  Type of Assault	Met Standard
Inmate-on-inmate	81
Inmate-on-staff	11
Total	92
% of CSDCAF with "Assault Type" box checked	97%

One inmate-on-inmate and two inmate-on-staff for a total of three CSDCAFs did not have a box checked in "Assault Type" section of the form. 11

### Audit Objective #4

Verify whether the appropriate "Assault Type" (inmate-on-inmate or inmate-on-staff) is being checked on the CSDCAF based on the facts set forth in the underlying crime reports to ensure that the correct assault type is properly entered into the LARCIS database.

#### **Procedures**

We reviewed the "Assault Type" designation checked on each CSDCAF and compared it to the related crime report to determine whether the appropriate box was checked. For example, if the CSDCAF had the box checked for "Inmate vs. Inmate," we examined the related crime report to verify that the victim and suspect were indeed inmates. Likewise, for boxes that were

<sup>&</sup>lt;sup>11</sup> Through its reconciliation process, CIS identifies CSDCAF's with missing boxes checked and alerts the facilities to have them changed in LARCIS for proper accounting of those assaults.

checked "Employee Assault", we confirmed that the victim in those cases were custody personnel.

#### Results

We excluded the three cases that did not have "Assault Type" boxes checked, leaving ninety-two cases for evaluation. All of the ninety-two cases (100%) of the sampled inmate assault cases checked the correct "Assault Type" box on the CSDCAF as shown in the following table:

Objective #4 Results  Type of Assault	Met Standard
Inmate-on-inmate	81
Inmate-on-staff	11
Total	92
% of incidents appropriately classified by CSDCAF check	
boxes	100%

# Audit Objective #5

Determine if inmate assault reports are being completed within three days as required by Department policy to ensure that all inmate assault incidents are captured when running the LARCIS 9A report used to count inmate assaults.

#### Procedures

For each sample case, we obtained the date of the inmate assault and compared it to the date the crime report was completed and calculated the difference between the two dates. Timely completion of crime reports is essential to keep the information in LARCIS current and thereby keep the inmate assault totals published by the Department up-to-date.

#### Results

Ninety-five out of ninety-five (100-percent) of the sampled assault cases met the standard for this objective as summarized in the following table:

Objective #5 Results	
Type of Assault	Met Standard
Inmate-on-inmate	82
Inmate-on-staff	13
Total	95
	100
% of crime reports submitted within 3 days of crime being reported	100%

# Accuracy Issue: Multiple Victims in the Same Incident

Although the 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 Department is still unable to provide the number of total victims in an incident.

In the 2017 OIG report, we identified a data tracking issue that potentially resulted in an underreporting of inmate assaults victims. This issue involved the ability to track multiple assaults that occur in a single incident. For example, if an incident involved three victims in an inmate-on-inmate assault, the current reporting would only indicate one inmate-on-inmate assault and not the three that actually occurred. The Department reported that LARCIS only has the ability to record multiple victims in incidents involving "aggravated assaults." LARCIS cannot record multiple victims for non-aggravated assaults. <sup>13</sup> Furthermore, even in incidents involving aggravated assaults, LARCIS cannot differentiate between inmate-on-inmate and inmate-on-staff assaults. LARCIS can only track the number of assaults within an incident, not the type of assault.

In 2018, there were a total of 3,514<sup>14</sup> non-aggravated assaults which constitutes about eighty-four percent of the total 4,208 assaults reported. The Department reported that it plans to modify LARCIS to have the ability to record and report the total number of victims of all inmate assaults broken down by type for both aggravated and non-aggravated assaults.<sup>15</sup>

https://www2.fbi.gov/ucr/cius 04/appendices/appendix 02.html

https://www2.fbi.gov/ucr/cius 04/appendices/appendix 02.html

<sup>14</sup> With LARCIS statistical codes 144, 145, 146, and 147.

Aggravated assaults are defined as "an unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury." FBI UCR Program Part I Crimes --

Defined as "assaults and attempted assaults which are not of an aggravated nature and do not result in serious injury to the victim". FBI UCR Program Part II Crimes-Other assaults (simple) --

<sup>&</sup>lt;sup>15</sup> CSS reported that the status of this request is still pending with the LARCIS team and there is no new update since the request was submitted.

#### CONCLUSION

Excepting the aforementioned accuracy issue related to tracking multiple assaults in a single incident, the Department's interim changes in processes and procedures for reporting inmate assaults during the 2018 audit period appear to be yielding consistent and replicable totals in tracking individual incidents of inmate violence.

A comparison of an inmate assault data set prepared by the OIG to three other inmate assault totals published by the Department at different times and in different formats data showed very little to no variance. This indicated that the interim procedures put into place by the Department have likely been effective. The interim procedures also require that all crime reports include a CSDCAF, be submitted in a timely fashion, and that the boxes in CSDCAF be checked with the appropriate type of inmate assault.

Overall, the Department's efforts to produce consistent and replicable data have been successful. We believe this has been achieved due to having multiple checks in their processes, the reliance on a single source (LARCIS) of published data, changes to the LARCIS system and the continuing training of their staff.

### **RECOMMENDATIONS**

Based on our review of the Department's interim procedures for tracking custody inmate assault totals, the OIG makes the following recommendations set forth below.

- It is recommended that the Department develop an automated LARCIS exception report
  that identifies all crime reports that do not have a CSDCAF attached. Currently, CIS staff
  must identify reports without CSDCAF's by visually scanning through a query result that
  is NOT printable or downloadable thereby increasing the possibility of user error.
- It is recommended that the Department expand LARCIS reporting to capture and report the total number of victims broken down by type of assault for incidents involving multiple victims.
- It is recommended that the Department continue its periodic trainings on the required data entry in LARCIS and the writing of crime reports as outlined in Informational Bulletin #2017-11 and CIS Training Bulletin dated 02/07/2018 February 7, 2018.

### **EXHIBIT 3**

LOS ANGELES COUNTY
OFFICE OF INSPECTOR GENERAL



# LOS ANGELES COUNTY SHERIFF'S DEPARTMENT INMATE RECEPTION CENTER USE OF FORCE ALERT



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#### **EXHIBIT 4**

LOS ANGELES COUNTY
OFFICE OF INSPECTOR GENERAL



#### LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

MONTHLY FORCE SYNOPSIS - January 2018

The Information contained in this spreadsheet is fragmentary has not been completely verified, and is subject to change. It is, in part, based on preliminary inquiry and is intended for early informational use rather than being a formal investigative report.

DATE/TIME	Loc	URN/REF#	BRIEF NARRATIVE
01/01/2018 1346 Hrs	TTCF		CATEGORY 1 USE OF FORCE (MENTAL/O.C. SPRAY): As Inmate 1 entered the pod after meeting with his clinician, Inmate 2 began assaulting Inmate 1 with a broom stick. Deputy 1 gave Inmate 2 verbal commands to stop the assault. Inmate 2 did not comply. Deputy 1 employed his O.C. spray in the direction of Inmate 2. Inmate 2 stopped the assault on Inmate 1. Inmate 2 was handcuffed and escorted out of the pod without any further incident. Inmate 1 was decontaminated for O.C. spray exposure. Inmate 2 was escorted to Tower One Clinic to be treated for the injuries sustained during the fight. Inmate 2 did not complain of pain and did not sustain any injuries as a result of the use of force. Incident Location: Module 142 8-Pod
01/01/2018 1436 Hrs	WCI		CATEGORY 1 USE OF FORCE (DIRECTED/CONTROL HOLDS/TAKEDOWN): While in the clinic, Inmate 1 became uncooperative and assaultive towards Custody personnel Sergeant 1 directed a takedown of Inmate 1 While on the floor, Inmate 1 continued to resist., Control holds were used to maintain control over Inmate 1 Inmate 1 became compliant and was medically evaluated by the MCI medical staff. No injuries to custody personnel, nor Inmate 1 occurred as a result of this incident. Incident Location. Main Clinic
1/02/2018 950 Hrs	MCI	8	CATEGORY 1 USE OF FORCE (ASSAULT ON STAFF/O.C. SPRAY): Inmate 1 was escorted to the main clinic to be cleared by the medical staff after coming off of a hunger strike Inmate 1 was to be rehoused at the Twin Towers Correctional Facility in their High Observation Housing (HOH) at the direction of the Department of Mental Health. As he was awaiting housing, Inmate 1 was handcuffed and sitting on a gurney. During this time, he became upset after learning that he was going to the Twin Towers Correctional Facility While Sergeant 1 was explaining to Inmate 1 why he was being transferred he spat at Sergeant 1. Deputy 1 immediately sprayed Inmate 1 with a 2 second burst of his O.C. Spray striking Inmate 1 in the face. This was to prevent Inmate 1 from continuing his assault. Once Inmate 1 was medically cleared for housing, he was escorted to the Twin Towers Correctional Facility without further incident. Incident Location: Main Clinic

01/02/2018 1047 Hrs	TTCF	CATEGORY 1 USE OF FORCE (CONTROL HOLDS): Inmate 1 was being rehoused after returning from visiting. While personnel were at hi-cell trying to un-handcuff him at the open tray slot, Inmate 1 pulled away from them. Personnel used control techniques to overcome his resistance and to keep Inmate 1 from taking control of his handcuffs. Once personnel recovered the handcuffs, the tray slot was closed. Inmate 1 complained of pain to his wrists. He was then medically evaluated at his cell, due to the fact he remained hostile toward staff. Incident Location: Module 152
01/02/2018 1933 Hrs	MCI	CATEGORY 1 USE OF FORCE (CONTROL HOLDS): Inmate 1 demanded for the nursing staff to give him medication that was not prescribed to him. He became belligerent and pulled away from personnel when they attempted to handcuff him. Control holds were used to overcome his resistance. While being handcuffed, Inmate 1 leaned forward and placed his head against the wall. Inmate 1 was medically cleared at the MCJ Clinic and subsequently escorted to Twin Towers for further mental health evaluation. Inmate 1 complained of head pain as a result of this incident. Incident Location: 3000 Floor
01/03/2018 0146 Hrs	IRC	CATEGORY 1 USE OF FORCE (O.C. SPRAY): Inmate 1 attacked Inmate 2 Inmate 2 was not fighting back, but covered his head and face to prevent injury. Deputy 1 and Custody Assistant 1 gave to Inmate 1 verbal commands to stop the assault. However, he ignored the commands. Fearing for the safety of Inmate 2, Deputy 1 delivered a single 2 -3 second burst of O.C. spray into the face of Inmate 1. Inmate 1 ceased his assaultive behavior and retreated to the rear of the cell. Custody staff then removed Inmate 2 from the cell, as well as the other, uninvolved, inmates.
01/03/2018 1440 Hrs	TTCF	CATEGORY 1 USE OF FORCE (MENTAL/O.C. SPRAY): Inmate 1 punched and kicked Inmate 2. Deputy 1 gave both inmates verbal commands to stop fighting. The inmates ignored Deputy 1's commands. Therefore, a two second burst of his hand held O.C. spray striking Inmate 1 in the face. The spray had a positive effect on Inmate 1. Inmate 1 was escorted to the D.E.F. outdoor recreation area, where he was treated for O.C. exposure by the Tower One medical staff. Incident Location: Module 132 Staging Area

01/03/ <b>2018</b> 2030 Hrs	CRDF	CATEGORY 2 USE OF FORCE (PERSONAL WEAPONS/CONTROL HOLDS/TEAM TAKEDOWN): While going through the Body Scanner, Inmate 1 was yelling profanities at Deputy 1. When the body scan was complete, Deputy 1 approached Inmate 1 to hand cuffed her. Inmate 1 pulled away from Deputy 1 and punched Deputy 1 in the face. Deputies 1 and 2 utilized their personal weapons to prevent Inmate 1 from further assaulting Deputy 1. Deputies conducted a team takedown of Inmate 1. Deputy 3 secured Inmate 1's legs while on the floor. Deputies were able to roll Inmate 1 onto her stomach and handcuffed her Inmate 1 became compliant and a hobble was placed on her. Inmate 1 was secured to a gurney without further incident Incident Location: Reception Bus Bay
1/3/2018	NCCF	CATEGORY 1 USE OF FORCE (O.C. SPRAY): Inmates 1 and 2 were waiting by the 715 Staff Station to enter their dorms when Inmate 2 punched Inmate 1 in the head and continued to assault him. After verbal commands failed to end the assault, Custody Assistant 1 sprayed a short burst of O.C. spray from his can. The spray made contact with Inmate 2 and ended the assault Incident Location. Staff Station 715
1/3/2018	MCJ	NON-CATEGORIZED INCIDENT
1/3/2018	TTCF	NON-CATEGORIZED INCIDENT
01/04/2018 0428 Hrs	IRC	CATEGORY 1 USE OF FORCE (CONTROL HOLDS/TAKEDOWN/HOBBLE): Inmate 1 walked into the staging area and appeared to be disorientated and confused. Deputies attempted to escort Inmate 1 to an area where they could access his housing location. Inmate 1 pulled away from deputies, so a takedown was conducted on Inmate 1 While on the floor, control holds were used to restrain Inmate 1. A hobble was placed onto Inmate 1's legs. Inmate 1 was placed onto a safety chair without the use of force, pending his medical and mental health assessment at the IRC Clinic. Incident Location:

### **EXHIBIT 5**

LOS ANGELES COUNTY
OFFICE OF INSPECTOR GENERAL



## LOS ANGELES COUNTY SHERIFF'S DEPARTMENT MONTHLY FORCE USED BY CATEGORY

The information contained in the report is fragmentary, has not been completely verified, and is subject to change. It is, in part, based on preliminary inquiry and is intended for early informational use rather than being a formal investigative report.

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#### **EXHIBIT 6**

LOS ANGELES COUNTY OFFICE OF INSPECTOR GENERAL

#### INCIDENT INFORMATION

Reporting Deputy	Emp	loyee#:	URN:							
INCIDENT FACILITY										
TOWER / BUILDING / COMPOUND / FL	OOR / MEDICAL	BARRACK / MOE	ULE / DORM	CELL / BUNK						
HOUSING GROUP (CHOOSE ONE	WEAPON TYPE IS	HODES ALL THAT AGELYL	LOCATION TYPE							
GENERAL POPULATION DISCIPLINE MENTAL HEALTH MEDICAL  ASSAULT TYPE (CHOOSE ALL THAT APPLY) EMPLOYEE ASSAULT - BODILY FORCE EMPLOYEE ASSAULT - WEAPON USED EMPLOYEE ASSAULT - LIQUIDS (NOT BODRY FLUIDS) INMATE VS INMATE - BODILY FORCE INMATE VS INMATE - WEAPON USED	BITING / TEETH BLOOD BLUNT OBJECT FECES FEET HANDS HEAD JAIL MADE WEAP JAIL MADE WEAP	ON - SAP ON - SHANK ON - SPEAR	LOCATION TYPE (CHOOSE ALL THAT  ATTORNEY ROOM)  BARBER  BARBER  BARBER  BARBER  BARBER  BARBER  BARBER  BARBER  BARBER  BASEMENT  BATHROOM  BOOKING / BOOKING FRONT  BOOKING REAR  BUNK  BUS / VAN / TRANSPORT VEHICLE  BUS BAY  CASHIER'S OFFICE  CELL  CELL  CELL  CHAPEL  CHAPEL  CHAPEL							
INMATE VS INMATE – LIQUIDS SEXUAL ASSAULT – INMATE VICTIM SEXUAL ASSAULT – STAFF VICTIM	C NUKNOMN FIGHT	D	CUNIC - MINI COMPOUND COURT LINE	HOOL IFIRMARY / URGENT CARE						
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ONE ON ONE MANY ON DNE	CELL PHONE		CUSTODY LINE							
MANY ON MANY	CIGARETTE / TOB		DAY ROOM DMH OFFICE DOCK							
INMATE DISTURBANCE  YES - MAIOR (683)  YES - MINOR (682)	COUNTY PROPERT ESCAPE PREPARAT HANDCUFF KEY HAPPY CARD MAIL / LETTERS NARCOTICS		DORM  ELEVATOR / ESCA  EQUESTRIAN CEN  HALLWAY HOLDING AREA / HOSPITAL (OUTS)	TER / NURSERY						
GANG RELATED (CHECK IF APPLIES)  Types - (860)	PARAPHERNALIA PRUNO WEAPON		INDOOR RECREATED INDOOR RECREATED INDOOR RECREATED INDOOR	ION						
RACE RELATED (CHECK IF APPLIES)  YES - (520)	SHIFT (CHOOSE ONE	}	LAUNDRY ROOM LAW LIBRARY LOBBY MAIL ROOM							
SUICIDE (OR ATTEMPT) TYPE (CHOOSE ALL THAT APPLY)  CUTTING  DROWNING  HANGING  JUMPER  OVERDOSE  SUFFOCATION	EM		MAIN CONTROL MESS HALL MESS HALL MODULE OUTDOOR REC / N PARKING LOT POD RAMP REC ROOM RELEASE ROOF SALLY PORT SHOWER STAFF STATION / STAGING AREA STAIRWAY STREET TRANSFER BRIDG TRANSFER CENTE VISITING VOCATIONAL SHO	CONTROL BOOTH E R (TTCF)						

Reporting Deputy	1	mployee#:	URN:	
VICTIM # VICTIM NAME (Last name, First Name	e)	HOUSING FACILITY	BARRACK / MODULE / DORM	CELL / BUNK
VICTIM H VICTIM NAME (Lost name, First Name	2)	HOUSING FACILITY	BARRACK / MODULE / DORM	CELL / BUNK
VICTIM # VICTIM NAME (Last name, First Name		HOUSING FACILITY	BARRACK / MODULE / DORM	CELL / BUNK
VICTIM # VICTIM NAME (Last name, First Name	2	HOUSING FACILITY	BARRACK / MODULE / DORM	CELL / BUNK
SCARS/MARKS/TATTOOS  (Victim #S/M/TL/ # Body Part Description  HAIR LENGTH  G G G G  COLLAR  C	TEETH COCO	ACCENT DISGUIS LISPS MUMBLES NORMAL RAPID SLUPRED SLUPRED STUTTER BRACES	V CTIM TYPE	COOKS
HAIR STYLE  AFRONATURAL  BRAIDED / DREADLOCKS  COMBED BACK  COMBED BAC		J BUCK CROCKED CROOKED	K-5 (AD SEG)	WAYS) WAYS) WAYS) WAYS)
BEARD  CLEAN SAVEN  FUZZ  GOATEE  LOWER LIP  MOUSTACHE  SIDE BURNS  UNSHAVEN	MENTAL C	PES (CHECC(FAPALIS) YES  APPLIES  YES  R W/DISABILITIES ACT)	SUB-CLASSIFICATIONS (CHOOSE ALL THAT APPLY)  A B C D (A) HANDCUFF COV  C C (B) THREATS  C C (P) PROTECTIVE CU  C C (F) FRAGILE  C C (F) FRAGILE  C C (H) HIGHLY DANGER	rea Stody Red
COMPLEXION  ACNE / POCKED  COMPLEXION  ALBINO  ALBINO  COMPLEXION  ALBINO  ALB	SECURITY CONTROL OF THE PROPERTY OF THE PROPER	LEVEL  1 - 4  1 5 - 7  1 8 ~ 9  STATUS (SIO1)  2 SENTENCE STATUS ONE 3 SENTENCE STATUS TWO	G) LGBTI G) LGBTI G) H) HIGHLY DANGEI G) H) HIGHLY DANGEI G) H) AB 109 / PC 1170 G) LU LEG CHAINS G) LO CAUTIOUS G) PP SYCHOTROPIC G) CAUTIOUS G) SUICIDAL G) G) CONTEMPO G) CONTEMPO G) G) CONTEMPO G	MEDICATION  COURT LIKER NIMATE  NI PREDATORS

Reporting Deputy	Employee#:	URN:
SUSPECT # SUSPECT NAME (Last name, First Name)	HOUSING FACILITY	BARRACK / MODULE / DORM   CELL / BUNK
SUSPECT # SUSPECT NAME (Lost name, First Name)	HOUSING FACILITY	BARRACK / MODULE / DORM CELL / BUNK
SUSPECT # SUSPECT NAME (Last name, First Name)	HOUSING FACILITY	BARRACK / MODULE / DORM CELL / BUNK
SUSPECT # SUSPECT NAME (Last name, First Name)	HOUSING FACILITY	BARRACK / MODULE / DORM   CELL / BUNK
SCARS/MARKS/TATTOOS Suspect # S/M/T L/R Body Part Descriptio	.0	SECURITY LEVEL  (3 (3 (6 (0))) 1 - 4  (1 (1 (1)) 1 - 4  (1 (1)) 1 - 5 - 7  (1 (1)) 1 - 8 - 9
HAIR LENGTH  ABOVE AND ADDRESS OF THE SHOULDER  HAIR LENGTH  HANE  ABOVE AND ADDRESS OF THE SHOULDER  HANE  ABOVE AND ADDRESS OF THE SHOULDER  HANE  HANE  ABOVE AND ADDRESS OF THE SHOULDER  HANE  HANE  ABOVE AND ADDRESS OF THE SHOULDER  HANE  HANE  ABOVE AND ADDRESS OF THE SHOULDER  HANE  HANE  HANE  ABOVE AND ADDRESS OF THE SHOULDER  HANE  HANE  HANE  ABOVE AND ADDRESS OF THE SHOULDER  HANE  HANE  HANE  ABOVE AND ADDRESS OF THE SHOULDER  HANE  H	● ● LEFT RIGHT	SENTENCE STATUS (S.O.1)  DE COMPANY SENTENCE STATUS ONE DE COMPANY SENTENCE STATUS TWO DE COMPANY SENTENCE STATUS THREE
HAIR TYPE  HAIR TYPE  BALD  RECEDING  THICK  THINNING  HAIR STYLE  COLO BRAIDED / DREADLOCKS  HAIR STYLE  GOATEE / DREADLOCKS  HAIR TYPE  HAIR TYPE  HAIR TYPE  HAIR TYPE  HAIR STYLE  HAIR STYLE  HAIR COLO BRAIDED / DREADLOCKS  HAIR COLO BRAIDED	ACCENT DISGUISE LISPS MUMBLES MORMAL DI RAPID CI SLOW SLURRED DI STUTTER DI STUTTER DI BRACES CROOKED	CLASSIFICATION
PRECKLED  MENT  DE LIGHT / FAIR  ADA (	TAL OBS (CHECK FAFFUES)	