



**Office of Inspector General
County of Los Angeles**

**Report Card on
Sheriff's Department's Reforms
2019 to 2022**

Issued October 21, 2022

Recommendation Status		
Year	Implemented	Not Implemented
2019	4	36
2020	2	13
2021	1	33
2022	0	22
Total	7	104

2019 Recommendations	
Status	Total
Implemented	4
Not Implemented	36

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

RECOMMENDATION	ORIGINAL ISSUE
<p>1 The Sheriff's Department should attach narrative descriptions on the Sheriff's Department's website for all Deputy-Involved Shootings.</p> <p>Recommendation Implemented: Yes</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>1 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>Recommendation Implemented: Not implemented</p>	<p>The Sheriff’s Department’s tracking system did not accurately identify, and report hate crimes and hate incidents.</p>
<p>2 Provide refresher hate crimes trainings and mandate an implicit bias reduction training curriculum conducted by a subject matter expert in the area.</p> <p>Recommendation Implemented: Not implemented</p>	<p>The Sheriff’s Department personnel conducting hate crime trainings were not subject matter experts.</p>
<p>3 Require patrol deputies to use a checklist during hate crime investigations to help develop expertise in identifying and investigating such crimes.</p> <p>Recommendation Implemented: Not implemented</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>
<p>4 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>Recommendation Implemented: Not implemented</p>	<p>The Sheriff’s Department has no mechanism in place to ensure deputies familiarize themselves with the Attorney General’s protocols.</p>

<p>5</p>	<p>Implement community outreach programs related specifically to hate crimes and hate incidents.</p> <p>Recommendation Implemented: Not implemented</p>	<p>The Sheriff's Department should have community outreach programs in each community they serve.</p>
<p>6</p>	<p>Require cultural-sensitivity trainings to help build cultural competency.</p> <p>Recommendation Implemented: Not implemented</p>	<p>The Sheriff's Department was not consistently providing cultural-sensitivity trainings.</p>
<p>7</p>	<p>Develop stronger relationships with community leaders to better assess the unique needs and fears of vulnerable communities when reporting hate motivated events.</p> <p>Recommendation Implemented: Not implemented</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>
<p>8</p>	<p>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>Recommendation Implemented: Not implemented</p>	<p>The Sheriff's Department was not routinely updating its hate crimes brochure</p>
<p>9</p>	<p>Follow the requirements set forth in AB 1985.</p> <p>Recommendation Implemented: Not implemented</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>1 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>Recommendation Implemented: Not implemented</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>2 Before any supervisor is assigned to supervise the DHET, he or she receive training on Narcotic and Specialized Unit Supervision.</p> <p>Recommendation Implemented: Not implemented</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>
<p>3 All DHET supervisors and deputies attend annual training on search-and-seizure law updates and on expert testimony.</p> <p>Recommendation Implemented: Not implemented</p>	<p>The traffic stops analyzed by the Office of Inspector General revealed some alarming disproportionate statistics as to race and constitutional searches.</p>
<p>4 All DHET supervisors and deputies attend biannual training on racial profiling and cultural diversity.</p> <p>Recommendation Implemented: Not implemented</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>5 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</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>

	<p>how to develop legally-sound probable cause for pretextual traffic stops and any resulting detentions.</p> <p>Recommendation Implemented: Not implemented</p>	
6	<p>The Sheriff's Department should have a stand-alone policy that clearly prohibits racial profiling.</p> <p>Recommendation Implemented: Yes</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>
7	<p>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>Recommendation Implemented: Not implemented</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 September was vetted as required.</p>
8	<p>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>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,</p>

	<p>Recommendation Implemented: Not implemented</p>	<p>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>
<p>9</p>	<p>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>Recommendation Implemented: Not implemented</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>1 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>Recommendation Implemented: Not implemented</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>
<p>2 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>Recommendation Implemented: Not implemented</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>3</p>	<p>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>Recommendation Implemented: Not implemented</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>
<p>4</p>	<p>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>Recommendation Implemented: Not implemented</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</p>

		<p>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>
5	<p>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>Recommendation Implemented: Yes As of August 24, 2022, the Sheriff's Department has deployed 3,786 body worn cameras including all Patrol stations.</p>	<p>Availability of video evidence is critical to identifying problematic incidents while ensuring transparency and accountability.</p>
6	<p>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>Recommendation Implemented: Not implemented</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>1 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>Recommendation Implemented: 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>2 Sheriff's Department Safety of Firearms policy should include prohibition of carrying firearms while consuming alcohol in establishments that serve alcohol.</p> <p>Recommendation Implemented: 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>3 The rebuttable presumption language of the Sheriff's Department's Safety of Firearms policy should be removed.</p> <p>Recommendation Implemented: Not Implemented</p>	<p>The rebuttable presumption language in the Sheriff's Department's Safety of Firearms policy undermines the intent of the policy and could create confusion in interpreting the policy.</p>

<p>4</p>	<p>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>Recommendation Implemented: 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>5</p>	<p>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>Recommendation Implemented: Not Implemented</p>	<p>The language in Sheriff’s Department alcohol related policies should be consistent.</p>
<p>6</p>	<p>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>Recommendation Implemented: 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>1 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>Recommendation Implemented: Not implemented</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>2 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>Recommendation Implemented: Not 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>3 The Sheriff's Department should maintain adequate mental health housing for prisoners with moderate and severe mental illnesses.</p> <p>Recommendation Implemented: Not Implemented</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 or Module 231 (a dedicated</p>

		IRC Clinic overflow module) for several additional hours until appropriate housing becomes available.
4	<p>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>Recommendation Implemented: Not Implemented</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>
5	<p>The Sheriff's Department should work with the courts and other County partners to explore the feasibility of revising the bus schedule as necessary to conduct additional transports throughout the day and reduce IRC Clinic backlogging.</p> <p>Recommendation Implemented: Not Implemented</p>	<p>The influx of prisoners that arrived at the IRC in the late afternoon and evening hours added to existing backlogs in 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>
6	<p>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>Recommendation Implemented: Not Implemented</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>
7	<p>The Sheriff's Department should rescind the IRC Unit Order regarding fixed restraints or revise it to ensure</p>	<p>The Sheriff's Department's IRC Unit Order regarding fixed restraints modified tethering procedures beyond the scope</p>

	<p>it complies with the Custody Division Manual (CDM).</p> <p>Recommendation Implemented: Yes</p>	<p>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>
8	<p>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>Recommendation Implemented: Not Implemented</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>
9	<p>The Sheriff's Department should identify a timeframe beyond which patients awaiting housing in the IRC Clinic or Module 231 are released from custody if safe, adequate housing remains unavailable.</p> <p>Recommendation Implemented: Not Implemented</p>	<p>In-custody patients who required medical evaluations in the IRC Clinic encountered 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 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>1 Any change to the categorization of a use-of-force in the Electronic Line Operations Tracking System (e-LOTS) 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>Recommendation Implemented: Not implemented</p>	<p>E-Lots is a database used by Custody Support Services Bureau (CSS) to report and 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>
<p>2 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>Recommendation Implemented: Not implemented</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</p>

		<p>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>
3	<p>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>Recommendation Implemented: Not implemented</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>

INMATE ASSAULT TRACKING RECOMMENDATIONS:

RECOMMENDATION	ORIGINAL ISSUE
1	<p>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</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</p>

	<p>printable or downloadable thereby increasing the possibility of user error.</p> <p>Recommendation Implemented: Not implemented</p>	<p>assault data. The absence of a CSDCAF from a crime report would result in the underreporting of inmate assaults.</p>
<p>2</p>	<p>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>Recommendation Implemented: Not implemented</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>3</p>	<p>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>Recommendation Implemented: Not implemented</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>1 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>Recommendation Implemented: Yes</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>2 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>Recommendation Implemented: Not implemented</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>

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

RECOMMENDATION	ORIGINAL ISSUE
<p>1 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>Recommendation Implemented: Not implemented</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. their</p>

2	<p>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>Recommendation Implemented: Not implemented</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>
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USE OF FORCE REPORTING IN PATROL STATIONS AND CURRENT USE OF FORCE ISSUES
Published November 2020

RECOMMENDATION	ORIGINAL ISSUE	
1	<p>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>Recommendation Implemented: Yes, 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>2 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>Recommendation Implemented: Not Implemented; 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 person. (California Code of Regulations 999.226 subdivision (a)12(A)(8).</p>	<p>Case law across various jurisdictions have found the mere act of a police officer pointing a gun at someone may constitute excessive 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>
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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

<p>1 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>Recommendation Implemented: Not implemented; the Office of Inspector General was provided with a draft memorial policy and made recommendations for changes to the policy, but no subsequent drafts were shared.</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>
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<p>2</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>Recommendation Implemented: Not implemented</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>3</p>	<p>The Sheriff's Department should adopt policies and training to ensure that all complaints are classified properly</p> <p>Recommendation Implemented: Not implemented</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 identification of problem areas or employee misconduct. Misclassification of complaints may also lead to the masking of systemic issues.</p>

2021 Recommendations	
Status	Total
Implemented	1
Not Implemented	33

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

RECOMMENDATION	ORIGINAL ISSUE
<p>1 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-worn camera (BWC).</p> <p>Recommendation Implemented: Not implemented</p>	<p>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.</p>
<p>2 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>Recommendation Implemented: Not implemented</p>	<p>In recent months, LAPD has received criticism about its officers using third-party software for facial recognition purposes. LACRIS representatives, who also provide services to the LAPD, are aware of LAPD employees' practice of using third-party facial recognition software. LACRIS 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</p>

	not as stringently maintained as the photographs in the Department of Justice's data systems.
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**FOURTH REPORT BACK ON IMPLEMENTING BODY-WORN CAMERAS
IN LOS ANGELES COUNTY
Published March 2021**

RECOMMENDATION	ORIGINAL ISSUE
1	<p>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>Recommendation Implemented: Not implemented</p>
2	<p>The MPP policy prohibiting random checks for policy violations should be modified to allow random audits and searches for policy violations.</p> <p>Recommendation Implemented: Not implemented.</p>

<p>3</p>	<p>Misconduct appearing on video recordings should be investigated and appropriate action taken. The policy should be modified to incorporate accountability and a range of consequences for misconduct.</p> <p>Recommendation Implemented: Not implemented</p>	<p>MPP 3-06/200.58 provides for limiting the disciplinary consequences of misconduct discovered in a review of body-worn camera video.</p>
<p>4</p>	<p>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>Recommendation Implemented: Not Implemented</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>5</p>	<p>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>Recommendation Implemented: Not implemented</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>
<p>6</p>	<p>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>Recommendation Implemented: Not implemented</p>	<p>Videos posted on the internet by civilians and the media show deputies actively trying to prevent capturing deputies' actions on video.</p>

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

RECOMMENDATION	ORIGINAL ISSUE
<p>1 Ensure compliance with Penal Code section 830.10.</p> <p>Recommendation Implemented: 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.</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>
<p>2 The Sheriff's Department should enroll in Active Bystander Law Enforcement Training (ABLE).</p> <p>Recommendation Implemented: Not 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>1 Provide the Office of Inspector General with independent access to PRMS.</p> <p>Recommendation Implemented: Not Implemented</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>
<p>2 Provide the Office of Inspector General access to body-worn camera video.</p> <p>Recommendation Implemented: Not Implemented</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 body-worn camera video. It is impossible to independently verify the deputies' actions or to corroborate and/or disprove civilian complaints without access to the body-worn camera videos.</p>
<p>6 All complaints of harassment should be forwarded to the Office of Inspector General to monitor and investigate.</p> <p>Recommendation Implemented: Not implemented</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>7 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>Complaints by families that they are being harassed by Sheriff's deputies continued following the Office of Inspector General's November 2020 <i>Report Back to the Civilian Oversight Commission on Allegations of Harassment Families by LASD Patrol</i></p>

	<p>Recommendation Implemented: Not implemented</p>	<p><u>Operations Staff Following a Fatal Use of Force by LASD</u></p>
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**REFORM AND OVERSIGHT EFFORTS: LOS ANGELES COUNTY
SHERIFF’S DEPARTMENT APRIL TO JUNE 2021
Published August 2021**

	RECOMMENDATION	ORIGINAL ISSUE
1	<p>The Sheriff’s Department should update policies to reflect the order of the court and because the court order reflects best practices even if the preliminary injunction does not become permanent.</p> <p>Recommendation Implemented: Not implemented</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 implemented to comply with the court order.</p>

<p>2</p>	<p>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>Recommendation Implemented: 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>3</p>	<p>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>Recommendation Implemented: 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 conservative approach in sharing the details may impede the Death Review analysis and hinder the greater goal of correcting deficiencies</p>

	and preventing future tragedies.
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REVIEW OF AUGUST 7, 2020, SANTA CLARITA INCIDENT
Published September 2021

RECOMMENDATION	ORIGINAL ISSUE
<p>1 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>Recommendation Implemented: 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).</p>	<p>Deputies deployed handguns and an AR-15 rifle and pointed them at three teenagers. No “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.</p>
<p>2 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>Recommendation Implemented: Yes; 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>3</p>	<p>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>Recommendation Implemented: Not Implemented</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>
<p>4</p>	<p>Allegations of racial bias should be investigated when race is mentioned.</p> <p>Recommendation Implemented: Not Implemented</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>

<p>5</p>	<p>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>Recommendation Implemented: Not Implemented</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>6</p>	<p>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>Recommendation Implemented: Not implemented</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 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>7</p>	<p>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>Recommendation Implemented: Not implemented</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>
<p>8</p>	<p>The Sheriff's Department should audio and/or video record all interviews, including interviews of Sheriff's Department personnel.</p> <p>Recommendation Implemented: Not Implemented</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>9</p>	<p>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>Recommendation Implemented: Not Implemented</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>
<p>10</p>	<p>Labeling the parties to an incident as a suspect or a witness should not be done until the completion of the investigation.</p> <p>Recommendation Implemented: Not Implemented</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>1 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>Recommendation Implemented: Not Implemented</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>
<p>2 The Office of Inspector General should have unfettered viewing access to all BWC video through Evidence.com</p> <p>Recommendation Implemented: Not Implemented</p>	<p>The Department does not allow the Office of Inspector General access to view all body-worn camera videos.</p>

<p>3</p>	<p>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>Recommendation Implemented: Not Implemented</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>4</p>	<p>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 termination of the call for service or contact.</p> <p>Recommendation Implemented: Not Implemented</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>

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

	RECOMMENDATION	ORIGINAL ISSUE
<p>1</p>	<p>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</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-</p>

	<p>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>Recommendation Implemented: Not implemented</p>	<p>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 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>2</p>	<p>The Sheriff's Department should enact a policy prohibiting engaging in on-duty sexual activity.</p> <p>Recommendation Implemented: Not implemented</p>	<p>Examples provided in the report include instances of on-duty sexual activity.</p>
<p>3</p>	<p>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 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>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>

	<p>Recommendation Implemented: Not implemented</p>	
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2022 Recommendations	
Status	Total
Implemented	0
Not Implemented	22

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

RECOMMENDATION	ORIGINAL ISSUE
<p>1</p> <p>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>Recommendation Implemented: Not implemented</p>	<p>The nutritional and exercise needs of pregnant people in custody are not being met.</p>
<p>2</p> <p>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>Recommendation Implemented: Not implemented</p>	<p>The exercise time for incarcerated pregnant people is not being met.</p>
<p>3</p> <p>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</p>	<p>The exercise time for incarcerated pregnant people is not being met</p>

	<p>should identify and remedy such deficiencies.</p> <p>Recommendation Implemented: Not implemented</p>	
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REVIEW OF A DEPUTY-INVOLVED SHOOTING WITHOUT AN ADMINISTRATIVE INVESTIGATION

Published April 2022

	RECOMMENDATION	ORIGINAL ISSUE
1	<p>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>Recommendation Implemented: Not Implemented</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>
2	<p>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>Recommendation Implemented: 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>

<p>3</p>	<p>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>Recommendation Implemented: Not Implemented</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>4</p>	<p>The Sheriff's Department should re-negotiate the Gates-Johnson agreement.</p> <p>Recommendation Implemented: 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 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</p>

	of civilians by law enforcement personnel.
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**SIXTH REPORT BACK ON IMPLEMENTING BODY-WORN CAMERAS IN
LOS ANGELES COUNTY
Published April 2022**

RECOMMENDATION	ORIGINAL ISSUE
<p>1 The Gang Surveillance Unit (GSU) should receive BWCs.</p> <p>Recommendation Implemented: Not Implemented</p>	<p>The GSU deputies are deputized by the U.S. Marshals for all GSU operations. While the U.S. Marshals do not object to GSU deputies being required to deploy BWCs, according to the Sheriff’s Department the policy must be approved through federal government channels before the cameras can be deployed.</p>
<p>2 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>Recommendation Implemented: Not Implemented</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</p>

		bullet that resulted in the fatality.
3	<p>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>Recommendation Implemented: Not Implemented</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>1 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>Recommendation Implemented: Not Implemented</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</p>

		to the California Department of Justice.
2	To promote transparency and oversight, the Sheriff's Department should make all CAD system data available upon request to the Office of Inspector General. Recommendation Implemented: Not Implemented	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.
3	The Sheriff's Department should develop internal controls that ensure deputies are entering appropriate stop data in both the CAD and SACR systems. ¹ Recommendation Implemented: Not Implemented	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.
4	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. Recommendation Implemented: Not Implemented	The Sheriff's Department has routinely submitted inaccurate data to the State of California.
5	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-	Deputies routinely fail to accurately capture data from contacts with members of the public in violation of RIPA.

¹ Specific technical recommendations are set forth in the report. All of them address internal controls necessary to ensure that the data entered is accurately gathered and reported. This recommendation encompasses some of the internal controls that would assist with this accuracy.

	<p>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>Recommendation Implemented: Not Implemented</p>	
<p>6</p>	<p>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>Recommendation Implemented: Not Implemented</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 deputies with questions or issues they have when inputting data into the CAD and SACR systems.</p>
<p>7</p>	<p>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>Recommendation Implemented: Not Implemented</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

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RECOMMENDATION	ORIGINAL ISSUE
<p>1 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>Recommendation Implemented: Not Implemented</p>	<p>On September 16, 2021, the website "LAist" 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 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>2</p>	<p>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>Recommendation Implemented: Not Implemented</p>	<p>The Office of Inspector General met with Sheriff’s Department personnel to discuss this incident and requested the body-worn camera video of the deputy involved in the incident. The Sheriff’s Department refused to provide access to the video.</p>
<p>3</p>	<p>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>Recommendation Implemented: Not Implemented</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 involvement in the criminal justice system and recidivism.</p>
<p>4</p>	<p>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</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>

	<p>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>Recommendation Implemented: Not Implemented</p>	
<p>5</p>	<p>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>Recommendation Implemented: Not Implemented</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>