

# Reform and Oversight Efforts: Los Angeles County Sheriff's Department

**April through June 2025** 

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## **ABOUT QUARTERLY REPORTS**

Quarterly reports provide an overview of the Office of Inspector General's regular monitoring, auditing, and review of activities related to the Los Angeles County Sheriff's Department (Sheriff's Department) over a given three-month period. This quarterly report covers Department activities and incidents that occurred between January 1 and March 31, 2025, unless otherwise noted. Quarterly reports may also examine issues of interest. This report includes special sections on the following topics:

- Improving the Treatment of Family Members of Individuals Killed or Seriously Injured by Sheriff's Deputies
- Sheriff's Department's Policies Cooperation with Federal Immigration Authorities
- Compliance with the Settlement Agreement in Johnson v. Los Angeles Sheriff's Department for People in Custody with Mobility Impairments
- Jail Employment Opportunities at Century Regional Detention Facility

During the second quarter of 2025, the Office of Inspector General issued the following reports relating to the Sheriff's Department:

- Request for Information: COC Deputy Gangs-Recommendation No. 19
- <u>Inspector General's Ninth Implementation Status Report Johnson v.</u> Los Angeles County Sheriff's Department

### MONITORING SHERIFF'S DEPARTMENT'S OPERATIONS

# **Deputy-Involved Shootings**

The Office of Inspector General reports on all deputy-involved shootings in which a deputy intentionally fired a firearm at a human, or intentionally or unintentionally fired a firearm and a human was injured or killed as a result. During this quarter, there were two incidents in which people were shot or shot at by Sheriff's Department personnel. Two people were fatally struck by deputies' gunfire. The Office of Inspector General staff responded to each of these deputy-involved shootings. As communicated in a memorandum to the Board of Supervisors dated June 11, 2025, the Office of Inspector General suspended regular rollouts to deputy-involved shootings.

The information in the following shooting summaries is based on the limited information provided by the Sheriff's Department and is preliminary in nature. While the Office of

Inspector General receives information at the walk-through at the scene of the shooting, receives preliminary memoranda with summaries, and attends the Sheriff's Department Critical Incident Reviews, the statements of the deputies and witnesses are not provided until the Sheriff's Department completes its investigation. The Sheriff's Department permits the Office of Inspector General's staff limited access to monitor the ongoing investigations of deputy-involved shootings. The Sheriff's Department also <a href="maintains a page on its website">maintains a page on its website</a> listing deputy-involved shootings that result in injury or death, with links to incident summaries and video.

### **Lancaster Station: Hit Shooting – Fatal**

On June 7, 2025, at approximately 7:07 p.m., deputies from the Lancaster Station responded to an armed robbery, with a gun, in the 1200 block of Meadow View Circle in the city of Lancaster. One responding deputy saw a 31-year-old Hispanic man who matched the description of the robbery suspect in the 1000 block of West Avenue J-12. The deputy detained the suspect at gunpoint while waiting for back-up deputies to arrive. The suspect was not cooperative and failed to follow commands. Two deputies approached the suspect and attempted to physically detain him, at which point a struggle ensued. During the struggle, the deputies observed that the suspect was armed with a handgun. A third deputy on scene deployed a taser and the suspect then shot the deputy who initially detained him at gunpoint. When the suspect opened fire, the three deputies responded by returning fire. The suspect also pointed the gun at another deputy during the altercation.

Three deputies fired 9, 11, and 15 rounds respectively, striking the suspect.

The deputy who was hit by the suspect's gunfire was transported to the hospital and had emergency surgery. The deputy is expected to recover.

The deputies rendered aid to the suspect prior to the arrival of Los Angeles County Fire Department personnel. The suspect was pronounced dead at the scene.

A loaded handgun was recovered at the scene. It was later determined that the suspect was not involved in the robbery.

After the Sheriff's Department Homicide investigators completed their preliminary investigation, Office of Inspector General, the Sheriff's Department Internal Affairs Bureau (IAB), and District Attorney staff on scene were briefed by Homicide investigators and escorted from the command post to the crime scene where they were permitted to view the scene from a few car lengths away.

The Sheriff's Department posted a <u>Critical Incident Briefing</u> on its website with audio from a 911 caller, video from deputies' body-worn cameras, and civilian cell phone video.

### Areas for Further Inquiry

Was the approach to the suspect tactically sound and consistent with best practices?

### **Century Station: Hit Shooting – Fatal**

On June 9, 2025, at approximately 12:32 a.m., Century Station deputies responded to a residential burglary in progress in the 3300 Block of Los Flores Boulevard in the city of Lynwood.

Two family members were able to flee from the house to a neighbor's house next door. The neighbor called 911 and stated that there was a man armed with a knife still inside breaking items. The family members told arriving deputies that there was an elderly woman still in the house.

The deputies approached the home from alongside the driveway where they could see inside through the kitchen window. As they looked in, deputies saw a 45-year-old, Hispanic man holding what looked to them like a pair of scissors. Deputies told the suspect to drop the scissors; he refused and went to another part of the house. The deputies then used a Public Announcement system in an unsuccessful attempt to have the man exit the house. The deputies formulated a tactical plan to rescue the victim inside by breaking and entering through a bedroom window. Soon after they shattered the bedroom window, deputies heard the victim inside screaming and one deputy saw the suspect stabbing the woman.

Deputies then forced entry through a side door and saw the suspect on his knees stabbing the victim in a hallway, at which time one of the deputies fired 11 rounds at the suspect, striking him numerous times.

Once the victim was moved to safety, deputies rendered medical aid, including CPR, to the suspect while waiting for Los Angeles County Fire Department personnel to respond. The suspect was transported to the hospital where he later died. The victim's injuries were not life threatening, and no deputies were injured. A knife with an approximate 7-inch blade and scissors were recovered from the scene.

The Sheriff's Department posted a <u>Critical Incident Briefing</u> on its website with audio from a 911 caller and video from deputies' body-worn cameras.

After the Sheriff's Department Homicide investigators completed their preliminary investigation, Office of Inspector General, IAB, and District Attorney staff on scene were briefed by the investigators and escorted from the command post to the residence where the crime took place. During the briefing, members of the three offices remained outside of the home, along the sidewalk and driveway, and were not permitted to enter the residence where the shooting took place.

### Areas for Further Inquiry

Was the time delay between the deputies' arrival and the time they entered the residence reasonable under the circumstances? Was there any consideration given to requesting a Special Enforcement Bureau (SEB) and or Mental Health Evaluation Team (MET) to respond to the location?

### **District Attorney Review of Deputy-Involved Shootings**

The Sheriff's Department's Homicide Bureau investigates deputy-involved shootings in which a person is hit by a bullet, except for deputy-involved shootings that result in the death of an unarmed civilian, which California law requires the Attorney General to investigate. For those shootings it investigates, the Homicide Bureau submits the completed criminal investigation of each deputy-involved shooting that results in a person being struck by a bullet and which occurred in the County of Los Angeles to the Los Angeles County District Attorney's Office (District Attorney's Office or District Attorney) for review and possible filing of criminal charges.

Between April 1 and June 30, 2025, the District Attorney's Office posted memoranda on its website for four findings on deputy-involved shooting cases involving the Sheriff's Department's employees.<sup>2</sup> The District Attorney's Office declined to file charges in each case, as they determined that use of force was not unlawful. The memoranda may be found on the <u>District Attorney's website page for Officer-Involved Shootings</u>. The following are the deputy-involved shootings posted:

- The March 5, 2020, non-fatal shooting of Jesse Allan Janto and Non-hit shooting of Dain Edward Sanderson by Deputies Matthew Bistline, David Chavez-Cruz, Andrew De La Rosa, Jonathan Livingston, Collin Reddy, Ryan Thompson and Sergeant Jason Howell.
- The June 5, 2022, fatal shooting of Ricky Jimenez by Deputies Dany Soto, Joshua Bueso, Travis Long, and Josef Schirmeister.

<sup>&</sup>lt;sup>1</sup> In 2020, the California Legislature passed AB 1506, which requires that a state prosecutor investigate all shootings involving a peace officer that result in the death of an unarmed civilian. See A.B. 1506 (McCarty 2020) (codified at Govt. Code § 12525.3). The Attorney General's findings in these investigations are reported in the section of this report below entitled California Department of Justice Investigations of Deputy-Involved Shootings Resulting in the Death of Unarmed Civilians. Until the law took effect in 2021, the Sheriff's Department's Homicide Bureau investigated all deputy-involved shootings in which a person was hit by a bullet.

<sup>&</sup>lt;sup>2</sup> The District Attorney's Office posts its decisions on deputy and officer-involved shootings on its website under <u>Officer-Involved Shootings</u>. The Office of Inspector General retrieves the information on District Attorney decisions from this webpage. Two of the listed cases were posted on the website within the second quarter of 2025, are dated during the first quarter of 2025.

- The June 22, 2023, non-fatal shooting of Jesus Cerda by Deputy Taylor May.
- The September 2. 2022, fatal shooting of Rushdee Anderson by Deputies Justin Sabatine and Meshawn Telemaque.

# California Department of Justice Investigations of Deputy-Involved Shootings Resulting in the Death of Unarmed Civilians

Under California law, the state Department of Justice (CA-DOJ) investigates any peace officer-involved shooting resulting in the death of an unarmed civilian and may issue written reports or file criminal charges against a peace officer, if appropriate.<sup>3</sup> CA-DOJ is not currently investigating any shootings involving deputies from the Sheriff's Department. During the second quarter of 2025, DOJ issued no written reports regarding shootings involving Sheriff's Department deputies.

### Homicide Bureau's Investigation of Deputy-Involved Shootings

For the present quarter, the Homicide Bureau reports that it has eight shooting cases involving Sheriff's Department personnel open and under investigation. The oldest case in which the Homicide Bureau maintained an active investigation at the end of the quarter relates to a July 20, 2024 shooting in the jurisdiction of West Hollywood Station. For further information as to that shooting, please refer to the Office of Inspector General's report <u>Reform and Oversight Efforts: Los Angeles Sheriff's Department - July through September 2024.</u> The oldest case that the Homicide Bureau has open is a 2019 shooting in the city of Lynwood, which was submitted to the District Attorney's Office and for which the Sheriff's Department still awaits a filing decision.

This quarter, the Sheriff's Department reported it sent three deputy-involved-shooting cases to the District Attorney's Office for filing consideration.

## **Internal Criminal Investigations Bureau**

The Sheriff's Department's Internal Criminal Investigations Bureau (ICIB) reports directly to the Division Chief and the Commander of the Professional Standards Division. ICIB investigates allegations of criminal misconduct committed by Sheriff's Department personnel in Los Angeles County.<sup>4</sup>

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<sup>&</sup>lt;sup>3</sup> Government Code § 12525.3(b).

<sup>&</sup>lt;sup>4</sup> Misconduct alleged to have occurred in other counties is investigated by the law enforcement agencies in the jurisdictions where the crimes are alleged to have occurred.

The Sheriff's Department reports that ICIB has 77 active cases. This quarter, ICIB reports sending 12 cases to the District Attorney's Office for filing consideration. The District Attorney's Office is still reviewing 27 cases previously sent from ICIB for filing. The oldest open case that ICIB submitted to the District Attorney's Office and still awaits a filing decision relates to conduct that occurred in 2018, which ICIB presented to the District Attorney in 2019.

### **Internal Affairs Bureau**

The Internal Affairs Bureau (IAB) conducts administrative investigations of policy violations by Sheriff's Department employees. It also responds to and investigates deputy-involved shootings and significant use-of-force cases. If the District Attorney declines to file criminal charges against the deputies involved in a shooting, IAB reviews the shooting to determine whether Sheriff's Department personnel violated any policies during the incident.

The Sheriff's Department also conducts administrative investigations at the unit level. The subject's unit and IAB determine whether an incident should be investigated by IAB or remain a unit-level investigation based on the severity of the alleged policy violations.

During this quarter, the Sheriff's Department reported opening 130 new administrative investigations. Of these 130 cases, 50 were assigned to IAB, 41 were designated as unit-level investigations, and 39 were entered as criminal monitors (in which IAB monitors an ongoing criminal investigation conducted by the Sheriff's Department or another agency). In the same period, IAB reports that 108 cases were closed by IAB or at the unit level. There are 470 pending administrative investigations, of which 338 are assigned to IAB and the remaining 132 are unit-level investigations.

## **Civil Service Commission Dispositions**

The Civil Service Commission hears employees' appeals of major discipline, including discharges, reductions in rank, or suspensions of more than five days. Between April 1 and June 30, 2025, the Civil Service Commission issued final decisions in nine cases involving Sheriff's Department employees. In these nine cases, the Civil Service Commission sustained the Department's discipline in eight cases and overruled the Department in one case. The Civil Service Commission reports its actions, including final decisions, in minutes of its meetings posted on the County's website for commission publications.

## The Sheriff's Department's Use of Unmanned Aircraft Systems

According to <u>data posted by the Sheriff's Department</u>, it deployed its Unmanned Aircraft Systems (UAS) 27 times between April 1 and June 30, 2025.

Status of the Sheriff's Department's Adoption of an Updated Taser Policy and Implementation of a System of Tracking and Documenting Taser Use

### **Status of Taser Policy Implementation and Training**

On October 3, 2023, the Board of Supervisors (Board) passed a <u>motion</u> instructing the Sheriff's Department to revise its Taser policies and incorporate best practices from other law enforcement agencies to ensure its policies complied with State and Federal law. The motion directs the Inspector General to include in its quarterly reports to the Board the status of the Sheriff's Department updated Taser policy, deputy compliance with updated policies and training, and documentation on the Department's Taser use.

The Sheriff's Department reported the following information regarding training and policy implementation to date:

- Out of the 3,197 Taser 10s purchased by the Department as part of Phase I of
  the Taser 10 implementation plan, 2,686 Department members have been
  trained and issued a Taser 10. These members are primarily patrol personnel but
  also include personnel from Major Crimes Bureau, Operation Safe Streets,
  Special Enforcement Bureau, and Civil Management Bureau. There are 511
  Taser 10s still available to assign to deputies once they are trained. Because the
  number of patrol deputies is in flux, there may be more Taser 10s than deputies
  in need of training.
- Deputies are generally trained on the Taser 10 only if they are issued one.
- According to the Weapons Training Unit (WTU), a list of approved CEWs is currently being created.<sup>5</sup> This list will be maintained by the Tactics and Survival Unit (TAS) and posted on the TAS SharePoint site once the data is compiled.
- Per the Body-Worn Camera (BWC) Unit, approximately 3,000 CEWs (excluding the Taser 10) are currently out of warranty, with only about 50 still under warranty.

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<sup>&</sup>lt;sup>5</sup> The Sheriff's Department refers to Tasers by the generic name, Conducted Energy Weapons, abbreviated as CEW. The term Taser and CEW are used interchangeably in this report.

- The following CEWs are currently still approved for use:
  - M26 (legacy model currently being phased out)
  - X26 (currently being phased out)
  - X26P (currently being phased out)
  - Taser 7 (currently being phased out)
  - o Taser 10
- All Department personnel may also purchase a Department-approved CEW for off-duty use, as specified in the Manual of Policy and Procedure (MPP) section 5-06/045.10.
- For personnel assigned to the Custody Division, Custody Division Manual (CDM) section 7-08/030.00 allows personnel to purchase a CEW for on-duty use in custody, which "may be carried only after the approval of the unit commander, inspection by CTSB and successful completion of the Department's TASER training program." This policy also requires that the CEW be available for computer download at the request of a supervisor. The Department reports that Custody Division, Custody Operations Directive 22-005, Updated Procedures for the Use of the Conducted Energy Weapon (CEW), is the operative policy, superseding the relevant section of the CDM. Per this directive, Department personnel may only carry Department authorized CEWs whether on or off duty and may only carry personally owned CEWs with approval of their unit commander and after inspection by CTSB, which is consistent with the CDM. We recommend that the CDM be revised to ensure compliance with this directive and, if not immediately revised, that a reference to Custody Operations Directive 22-005 be referenced in CDM 7-08/030.00 as soon as possible.
- MPP sections 5-06/045.00 through 05-06/045.14 are in effect and apply to all patrol personnel, including those issued a Taser 10.7
- Custody Division is not equipped with the Taser 10. <u>CDM section 7-08/030.00</u> is specific to personnel assigned to Custody Division.
- Court Services Division is also not equipped with the Taser 10. <u>Court Services</u>
   <u>Division Manual section 1-04/030.00</u> applies specifically to personnel assigned to
   Court Services Division.

<sup>&</sup>lt;sup>6</sup> CTSB is the initialism for Custody Training and Standards Bureau.

<sup>&</sup>lt;sup>7</sup> CEW policies are in the Department's MPP in Volume 5, Chapter 6.

### **Tracking Taser Use**

In May 2024, the Sheriff's Department launched a <u>web dashboard reporting Taser</u> <u>usage</u> by date range with options to narrow the results by practice area (such as Patrol or Custody), patrol station or facility, incident type, or city. Beginning in July 2024, the Department began including in that data the "Result of the Use of Force" (i.e., whether the use resulted in serious injury or death).

### Semi-Annual Report on Implementation of the Family Assistance Program

The Los Angeles County Board of Supervisors established the Family Assistance Program (Family Assistance), first in 2019 as a one-year pilot, that it later made permanent, with the aim of improving compassionate communication and providing trauma-informed support to families of those who died following a fatal use of force by a Sheriff's Department employee or while in the custody of the Sheriff's Department. The Office of Inspector General reports semi-annually on Family Assistance in its quarterly reports on the Sheriff's Department.

### **Family Assistance Status**

The Family Assistance Program is administered by the Office of Violence Prevention (OVP) within the Department of Public Health (DPH). OVP has a webpage with an overview of Family Assistance with links to the Family Assistance brochure in English and in Spanish and to the Family Assistance Application Form.

After review by the Contracts and Grants Division of DPH, OVP reports that OVP and the Los Angeles County Medical Examiner (DME) have finalized and executed the Memorandum of Understanding (MOU) that outlines the roles and responsibilities of the two Psychiatric Social Workers (PSW) IIs that are working onsite at DME, including the process for next-of-kin notifications and the process for families to claim the decedent's personal effects and property.

OVP also drafted and finalized the Family Assistance protocols that, as previously reported, were formed in collaboration with the multidisciplinary work group that meets monthly to discuss program design and implementation, protocols, eligibility criteria, and reviews cases. The work group includes representatives from the Sheriff's Department, DME, the Office of Inspector General, the Sheriff Civilian Oversight Commission (COC), Los Angeles County District Attorney Office, DMH, Los Angeles County Correctional Health Services, and Los Angeles Office of the County Counsel.

The Family Assistance Program annual report has also been drafted and shared with the work group. OVP anticipates the report will be ready to publish in August 2025.

### **Family Assistance Service Data**

OVP reports that from January 1, 2025, to June 30, 2025, a total of 30 families experienced the death of a loved one through a fatal use of force by a Sheriff's deputy or while in the custody of the Sheriff's Department. Out of the 30 deaths, 25 individuals lost their lives while in custody at a Sheriff's Department facility and 5 died due to a fatal use of force by a Sheriff's deputy. The Sheriff's Department also reported to OVP 1 death due to a fatal use of force by South Gate Police Department because the Sheriff's Department Homicide Bureau assisted South Gate with the investigation.

For the 31 families referred to Family Assistance, 26 were engaged and received at least one type of support service (crisis intervention, grief counseling, financial assistance, case management, advocacy, and referrals to additional resources). Four families did not respond to outreach attempts to engage them in the available services, and 1 family could not be reached as no next of kin was located. OVP distributed burial expense assistance to 25 families, with costs ranging from \$1,415 to \$7,500. The total amount of burial assistance disbursed was \$144,249.00. We reiterate the recommendation by DPH that the County align the burial expense limit with the state's California Crime Victim Compensation Board limit, which would raise the limit from \$7,500 to \$12,818.

# Improving the Treatment of Family Members of Individuals Killed or Seriously Injured by Sheriff's Deputies

On February 16, 2024, AB 3021 was introduced in the California Assembly.<sup>8</sup> The bill aimed to provide family members of individuals who are killed or seriously injured by law enforcement certain rights during the investigation of such incidents. While the bill failed to pass, the requirements of the bill are good policy for law enforcement agencies.

The California Penal Code, as well as the Model Rules of Professional Conduct, require attorneys and investigators to disclose information to witnesses, including the interviewer's name and whether they represent a party in the legal matter, before conducting such interviews. AB 3021 would have added a section to the California Penal Code requiring a law enforcement officer or investigator conducting an interview to identify themselves by their full name, present identification, state the name of their employing agency (for example, Sheriff's Department, District Attorney's Office), and to disclose whether the interviewer represents or is retained by the prosecution.

<sup>&</sup>lt;sup>8</sup> AB-3021 Criminal procedure: interrogations (2023-2024).

<sup>&</sup>lt;sup>9</sup> California Code, PEN 1054.8.; Rule 4.3: Dealing with Unrepresented Person.

<sup>&</sup>lt;sup>10</sup> AB-3021 Criminal procedure: interrogations (2023-2024) Bill Text.

Additionally, the proposed legislation required that the interviewer clearly inform a family member of the deceased or severely injured person that they are not being detained, may leave at any time, that anything they said or did could be used as evidence against them in civil or criminal court, that they have the right to remain silent, the right to refuse to be recorded, photographed, or searched, and the right to speak with a trusted person first and/or have them present during the interview.<sup>11</sup>

The proposed legislation importantly also required the interviewer explain to the family member that they have the right to ask about the status of their relative who was killed or seriously injured prior to any questioning, and regardless of whether they choose to be interviewed.<sup>12</sup>

The introduction of AB 3021 was based upon concerns about the techniques law enforcement agencies employ to obtain information from families while protecting peace officers from potential civil and criminal actions resulting from deaths or serious injuries caused by law enforcement. Advocates of the legislation highlighted stories from families whose loved ones were killed by law enforcement and, when questioned, police provided them with false and/or misleading information in order to obtain statements from them concerning their loved ones that were later used to justify law enforcement's conduct leading to the death. <sup>13</sup> In 2016, for example, a mentally ill teenage boy was killed by law enforcement and when questioning the father about his son's history and behavior, law enforcement never disclosed the son had been killed, even as the father asked about what would happen to his son in juvenile court. <sup>14</sup>

As reported by the Los Angeles Times, lawyers specializing in police misconduct cases describe these types of misleading and traumatizing tactics as routine across the country, where peace officers question family members to collect disparaging information about their loved one in an attempt to justify any force used and avoid civil and criminal liability. <sup>15</sup> Meanwhile, those being interviewed are left in the dark about the purpose of the interview and the role of the interviewer, may have no idea their relative has been killed or seriously injured by law enforcement, and may inadvertently provide information to law enforcement that is used to justify police misconduct.

In the Office of Inspector General's report on permanent support for Family Assistance, we reported that "[s]ome families reported that in their interactions with the Sheriff's

<sup>&</sup>lt;sup>11</sup> *Id*.

<sup>&</sup>lt;sup>12</sup> *Id*.

<sup>&</sup>lt;sup>13</sup> Assemblymember Kalra's Bill to Protect Grieving Families in Police Interrogations Moves Forward | Official Website - Assemblymember Ash Kalra Representing the 25th California Assembly District

<sup>&</sup>lt;sup>14</sup> Brian Howey, <u>After police killings, families are kept in the dark and grilled for information</u>, Los Angeles Times (March 28, 2023).

<sup>&</sup>lt;sup>15</sup> <u>Id.</u>

Department, they felt that the Sheriff's Department had predetermined that their deceased loved ones were guilty of crimes and treated families like 'co-conspirators.'"<sup>16</sup> We also noted that the Department of Mental Health (DMH) reported that Sheriff's Department next-of-kin notifications were sometimes not made in a manner sensitive to grieving families. As a result, we recommended that the initial death notification be made by Family Assistance representatives or trained Department of Medical Examiner (DME) social workers.

In fact, the primary reason that Family Assistance Program was implemented by the County is to acknowledge that families of those killed by Sheriff's Deputies suffer trauma regardless of whether the Sheriff's Department is legally liable. The shift to initially notifying the next of kin to the DMH's Office of Violence Prevention or trained DME social workers, recognized that contact by members of the same department as the deputy who shot their loved one or were responsible for their care in custody causes additional trauma, especially if investigators use the notification as a means to gather information about the deceased.

Better policing practices include law enforcement agencies implementing policies without being forced to by state law. The requirements of AB 3021 are sound policies that improve Sheriff's Department communications with the public, including the families of those who are killed or seriously injured by Department members. These families routinely comment at Civilian Oversight Commission meetings about their treatment by Sheriff's Department personnel. Adopting as policy the requirements of the proposed legislation will likely result in more trauma-informed treatment of family members. The Office of Inspector General recommends that the Sheriff's Department implement a policy that provides the safeguards proposed by AB 3021.

### Sheriff's Department's Cooperation with Federal Immigration Authorities

In 2017, during President Trump's first term, the Los Angeles County Board of Supervisors requested the Office of Inspector General to review, analyze, and make recommendations regarding the Sheriff's Department's policies as they relate to

<sup>&</sup>lt;sup>16</sup> <u>Semi-Annual Report on Implementation of the Family Assistance Program and Report Back on Permanent</u> <u>Support for Families Affected by the Los Angeles County Sheriff's Department; Identifying Sustainable Funding For</u> and Streamlining the Family Assistance Program (February 22, 2022).

immigration issues. From 2017 to 2020, the Office of Inspector General issued several reports on the matter.<sup>17</sup>

In our recent reporting on the Sheriff's Department's current immigration policies, the Office of Inspector General noted outdated policies in the Sheriff's Department Manual of Policy and Procedure. After bringing the outdated policies to the Department's attention, the Department reviewed them, determined that the policies should have been rescinded, and has since redacted the policies from departmental manuals. In addition to deleting these outdated policies, the Department re-briefed all personnel on the Department's current policies on immigration enforcement.

While the Sheriff's Department has policies that limit cooperation with federal authorities on immigration enforcement, data collected by the Sheriff's Department is sometimes unintentionally transferred to the federal government and such data may have the effect of assisting immigration authorities without the intent to do so. As discussed in a previous report, Live Scan data that includes a person's country of birth and other identifying information is collected by the Sheriff's Department at booking and then shared with the federal government by CA-DOJ, which requires the information.<sup>19</sup>

Like other policing agencies, the Sheriff's Department collects information from automatic license plate readers. While state law prohibits the sharing of this information with the federal government, there remain public concerns that the information from the license plate reader database may end up in the hands of federal agencies.<sup>20</sup> Below is a discussion of the use of license plate readers, California law on the prohibition of sharing the information, and the Department's policies on license plate readers that are relevant to their possible use by federal agencies.

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<sup>&</sup>lt;sup>17</sup> See <u>Immigration: Public Safety and Public Trust</u> (October 2017); <u>First Report Back on the Sheriff's Department's Adherence to Policies Regarding Cooperation with Immigration Authorities</u> (June 2018); <u>Second Report Back – Sheriff's Adherence to Policies Regarding Cooperation with Immigration Authorities</u> (November 2018); <u>Inspector General's Monitoring of Los Angeles County Sheriff's Department's Cooperation with Immigration Authorities</u> (February 2019); and <u>Report Back on Truth Act Forum – LASD Inmate Locater System and Public Access to Inmate Release Information</u> (December 2019).

<sup>&</sup>lt;sup>18</sup> The following sections have been rescinded from the Sheriff's Department's policies: Manual of Policy and Procedures (MPP) section 4-01/090.35 "Immigration Law Violations," and FOSS Newsletter 19-03, "Immigration and Customs Enforcement Agents, Detainers, and Station Jails."

<sup>&</sup>lt;sup>19</sup> See the section on *The Sheriff's Department's Policies for Cooperating with Federal Immigration Authorities* in our report *Reform and Oversight Efforts: Los Angeles County Sheriff's Department – January to March 2025* (May 2025). The Sheriff's Department reports that it abides by its policies and state law on cooperating with federal immigration enforcement. We are not aware of any cooperation by the Sheriff's Department with the federal government that violates either state law or the Department's policies.

<sup>&</sup>lt;sup>20</sup> A recent article in the Los Angeles Times discussed the use of technology by the Los Angeles Police Department. See Libor Jany, <u>How ICE is using the LAPD to track down immigrants for deportation</u>, Los Angeles Times (July 30, 2025).

### **License Plate Readers**

### What Are License Plate Readers and How Do They Work

Automated license plate readers (ALPR) systems were first developed in 1976 by the United Kingdom as a tool to combat terrorism.<sup>21</sup> As the name implies, these systems use cameras to capture and identify vehicle license plate information. ALPR cameras can be installed in fixed locations – such as traffic lights, buildings, or light poles – or mounted on police cars, making them mobile and capable of scanning plates while in motion. Once an image is captured, it is uploaded to a database where additional information can be extracted, including the vehicle's make and model, as well as the exact location, date and time the image was taken.

The ALPR system works by comparing captured license plate images to "hotlists" created by law enforcement agencies. These hotlists contain information about vehicles of interest, such as those associated with criminal activity. For example, in a kidnapping case, investigators may issue a description of a suspect's car, which would then be added to the hotlist. If that vehicle passes by a fixed ALPR camera or police car equipped with ALPR, the system automatically alerts law enforcement agents to its location, thereby, allowing law enforcement to quickly locate and detain the suspect.

The use of ALPR technology has expanded rapidly across the United States. A 2013 Department of Justice study found that nearly 77% of police agencies serving populations over 100,000 utilize the technology and that number has likely increased in the years since. This technology is not limited to use by law enforcement. In recent years private retailers such as Home Depot, and others, have purchased and installed ALPR systems on their premises. When, and if, they choose to do so, these businesses can share the data collected by their private ALPR cameras with law enforcement agencies, further extending the reach of the technology.

### Laws Governing ALPRs

Federal law is silent when it comes to the use of ALPRs. However, there are some U.S. Department of Justice (US-DOJ) policies that offer guidance on the broader framework for how such technologies may be employed. The US-DOJ's publication entitled <u>Guidance for Federal Law Enforcement Agencies Regarding the Use of Race</u>,

<sup>21</sup> Robert Spinks, "What You Need to Know about Automatic License Plate Readers," American Police Beat (October 20, 2023).

<sup>&</sup>lt;sup>22</sup> Ford School News, "Automated License Plate Readers Widely Used, Subject to Abuse," *University of Michigan* (February 22, 2023).

<sup>&</sup>lt;sup>23</sup> Jordan Elder, "San Antonio retailers turning to license place readers to help curb theft," Fox San Antonio (September 11, 2023).; https://www.homedepot.com/privacy/privacy-and-security-statement#ALPR.

<u>Ethnicity, Gender, National Origin, Religion, Sexual Orientation, or Gender Identity</u>, provides some guidance.<sup>24</sup> As summarized on Congress.Gov, Justice Department policy includes the following prohibition:

'federal law enforcement personnel may not consider race, ethnicity, gender, national origin, religion, sexual orientation, gender identity, or disability in law enforcement or intelligence activities.' <sup>25</sup>

However, there are exceptions to this policy that include violations of federal immigration or customs law. The federal government can use race, ethnicity, or national origin when it utilizes the data in an ALPR system if the information is trustworthy, is context and content specific (e.g. the information contains specifics such as time frame, method, locality, or purpose), the characteristic-based information is specific to a violation of federal immigration or customs law, and the action is reasonably merited by the totality of the circumstances.<sup>26</sup> These standards also apply to technological tools like the ALPR systems that are used by law enforcement. Such exceptions are of concern when large datasets are accessed by the federal government.

In 2016, California passed Senate Bill 34 (SB 34), which defines what ALPR systems are, outlines how law enforcement may use the technology, and sets guidelines on who can and cannot access the data captured by the cameras. This bill is codified under California Civil Code sections 1798.90.5 through1798.90.55. As it pertains to sharing of the information gathered, SB 34 allows only the sharing of information with a "public agency," which is defined in Civil Code section 1798.90.5(f) as "the state, any city, county, or city and county, or any agency or political subdivision of the state or a city, county, or city and county. The federal government is therefore not a public agency as defined by SB 34 and thus is not an entity with which APLR information may be shared. An Information Bulletin issued by the California Department of Justice in October 2023 provides: "SB 34 does not permit California [law enforcement agencies (LEAs)] to share ALPR information with private entities or out-of-state or federal agencies, including out-of-state and federal law enforcement agencies. This prohibition applies to ALPR

<sup>&</sup>lt;sup>24</sup> When accessing this publication, which was last published in May 2023, the first page of the document notes: "This is archived content from the U.S. Department of Justice website. The information here may be outdated and links no longer function." It is therefore possible that the current administration does not prohibit the use of these characteristics in exercising enforcement of federal immigration laws.

<sup>&</sup>lt;sup>25</sup> Finklea, Kristin, "Law Enforcement and Technology: Use of Automated License Plate Readers," *Congressional Research Service* (August 19, 2024).

<sup>&</sup>lt;sup>26</sup> <u>Guidance for Federal Law Enforcement Agencies Regarding the Use of Race, Ethnicity, Gender, National Origin, Religion, Sexual Orientation, or Gender Identity</u> (May 2023), at pages 7 to 11.

database(s) that LEAs access through private or public vendors who maintain ALPR information collected from multiple databases and/or public agencies."27

### Sheriff's Department's Policies on ALPR

MPP sections 5-09/550.00 through 5-09/550.50, Field Operations Directive 09-004, and the Department's ALPR Privacy Policy provide its employees with directives on how to handle, operate, and manage data collected through the Department's ALPR systems.<sup>28</sup> Access to the system is restricted; only designated and specially trained personnel are authorized to access and/or audit ALPR data.

All ALPR-trained personnel are required to know the Department's ALPR's privacy policy. The privacy policy states:

Information gathered or collected and records retained by LASD will not be:

- Sold, published, exchanged, or disclosed for commercial purposes.
- Disclosed or published without authorization.
- Disseminated to persons not authorized to access or use the information

LASD shall not confirm the existence or nonexistence of information to any person or agency that would not be eligible to receive the information unless otherwise required by law.

LASD shares ALPR data with other law enforcement agencies upon the execution of an inter-agency agreement by which each agency agrees that all ALPR data will be gathered, accessed, utilized, and disclosed in accordance with applicable law, and further agrees:

 ALPR data shall be available only to authorized users for legitimate law enforcement purposes.

<sup>&</sup>lt;sup>27</sup> California Department of Justice, "California Automated License Plate Reader Data Guidance," Information Bulletin No. 2023-DLE-06 (October 27, 2023).

<sup>&</sup>lt;sup>28</sup> See Los Angeles Sheriff's Department Manual of Policy and Procedure sections 5-09/550.00 through 5-09/550.50, and Field Operations Directive 09-004, "Automated License Plate Recognition (ALPR) System."

- Reasonable efforts will be made to ensure the accuracy of its data.
- Shared hotlist data will not be stored for more than 24 hours without refresh.
- Internal audits will be conducted periodically to ensure information is up to date and user queries are made for legitimate law enforcement purposes only.
- Audit trails shall be maintained by each agency as defined by their policy.<sup>29</sup>

Notably, the policy does not contain a definition of "public agency," further it allows the data to be shared with other law enforcement agencies and does not have a specific prohibition on sharing the information with federal agencies.<sup>30</sup> The same is true of all the Department's ALPR policies. The <u>privacy policy</u> does require the following:

Information gathered or collected and records retained by LASD may be accessed or disseminated for legitimate law enforcement, criminal justice, or public safety purposes only to persons or entities authorized by law to have such access and only for those uses and purposes specified in the law. (Emphasis added.)

The Department also reported that the provisions in its ALPR Inter-Agency Sharing Agreement comply with SB 34 and acknowledged that SB 34 prohibits the sharing of ALPR information with federal authorities, out-of-state agencies and private entities. The Communications and Fleet Management Bureau (CFMB), which oversees the ALPR system, confirmed through the Department's Office of Constitutional Policing that:

<sup>&</sup>lt;sup>29</sup> The Los Angeles Sheriff's Department, "The Los Angeles County Sheriff's Department's Automated License Plate Recognition (ALPR) Privacy Policy."

<sup>&</sup>lt;sup>30</sup> In the past, the Sheriff's Department shared ALPR data with <u>Palantir</u> but has not used Palantir for ALPR storage or access for the past five years. Palantir's data analysis software was developed as a military intelligence tool but is now used by organizations in both the public and private sector to compile data. Palantir developed software to assist ICE in identifying and tracking undocumented migrants and asylum seekers raising concerns that Palantir's data may be used as a government surveillance tool. (See Jeff Rumage, "<u>Inside Palantir: The Tech Giant Powering Government Intelligence</u>," Builtin.com (updated August 7, 2025.) The Sheriff's Department reports that all ALPR data is maintained on its vendor's secure cloud storage system.

there is no existing agreement between LASD and ICE or other federal agencies. Furthermore, LASD does not share ALPR data with out-of-state agencies that might provide access to ICE. Data sharing is strictly limited to California law enforcement agencies that adhere to similar restrictions and only after signing the ALPR Inter-Agency Sharing Agreement.<sup>31</sup>

As it pertains to the use of "hotlists," the Department's ALPR policy states:

The labeling of retained information (hotlist Information) will be evaluated by LASD or the originating agency when new information is gathered that may impact the reliability (content validity / software misread) of previously retained information. LASD will conduct periodic data quality reviews of information it originates and make every reasonable effort to ensure that the information from the ALPR System is correct.

The policy allows for ALPR data to be retained for up to five years. Data may be purged earlier due to privacy concerns or retained beyond five years if required for ongoing investigative purposes, including the prosecution or exoneration of criminal suspects.<sup>32</sup>

The Department conducts periodic internal audits "to ensure information is up to date and user queries are made for legitimate law enforcement purposes only," and those audits will be "conducted in such a manner as to protect the confidentiality, sensitivity, and privacy of the Department's information system(s)."<sup>33</sup>

### Sheriff's Department Use of ALPRs

The Sheriff's Department Advanced Surveillance and Protection (ASAP) team, under the Department's Communication and Fleet Management Bureau, is responsible for maintaining the Department's ALPR systems. Four sworn deputies and one civilian are assigned to the unit

According to ASAP, the Department currently operates about 1,200 fixed ALPR cameras, with a majority of those located in contract cities. One city where such camera found is the city of Malibu, which in 2021 funded the installation of 12 ALPR cameras at a cost of approximately \$26,000.<sup>34</sup> Since the Department provides contracted law

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<sup>&</sup>lt;sup>31</sup> This information was provided by the Department in an email dated March 18, 2025.

<sup>&</sup>lt;sup>32</sup> The Los Angeles Sheriff's Department, "The Los Angeles County Sheriff's Department's Automated License Plate Recognition (ALPR) Privacy Policy."

<sup>33</sup> Ihid

<sup>&</sup>lt;sup>34</sup> <u>Bravo, Samantha, "City begins implementation of the Automated License Plate Recognition Cameras," *The Malibu Times*, January 14, 2023.</u>

enforcement services to Malibu, these cameras are operated by Department personnel assigned to patrol the area. The city consulted with the Department on optimal camera placement, as reflected by the Malibu City Council's request for advice to enhance the system's effectiveness in deterring and responding to crimes.<sup>35</sup>

In addition to the 1,200 fixed cameras throughout the county, the Department also has roughly 44 out of 2,400 total patrol cars outfitted with mobile ALPR cameras. Most of these vehicles are funded by contract cities and are primarily assigned to patrol within the contract cities' jurisdictions. There are some exceptions where these contracted cars may be briefly reassigned as needed to assist with stopping crime in other areas.<sup>36</sup>

Dependent on the needs of their job, several patrol deputies and detectives have been trained to use the ALPR systems. An example of persons who would not require access are personnel assigned to the custody department since their job duties would not involve seeking and tracking vehicle movements to capture outstanding suspects. Hypothetically, if a patrol deputy got transferred to custody or to another position where ALPR access is no longer necessary for their job duties, the Department states that their access is automatically deactivated after 90 days. Once deactivated, the individual can no longer retrieve ALPR data.

The Department regularly updates its hotlists used by the ALPR systems. When a deputy receives an alert that a car they are following – or a vehicle of interest – has passed a fixed ALPR camera, the deputy must perform a secondary verification through the Mobile Data Terminal system in their car or by calling dispatch to confirm the information is current and accurate.<sup>37</sup>

The ASAP team is responsible for conducting audits of ALPR system usage, which are performed on a weekly basis. The purpose of these audits is to ensure deputies are using the system strictly in a "need-to-know," or "right-to know" situations. During the audit, the team reviews the deputies' ALPR queries to see if the deputies had a legitimate law enforcement purpose to undertake those actions.

Over the years, the Department has collected millions of images through its use of ALPR. With a few exceptions (such as data related to ongoing investigations), these images are automatically deleted after five years. While state law does not specify the maximum retention period for ALPR data, the Department has established its own internal policy of five years to retain the data.

<sup>35</sup> Ihid.

<sup>&</sup>lt;sup>36</sup> See MPP section 5-09/550.30, "Field Protocols-Patrol."

<sup>&</sup>lt;sup>37</sup> Ibid.

As stated previously, the Department emphasized that, in accordance with state law, it does not share any of its information with private agencies, out-of-state entities, and/or the federal government. For ALPR sharing agreements with other California law enforcement agencies the Department reports these agreements clearly state that partnering agencies must abide by the Sheriff's Department policies and state laws governing privacy, security, and confidentiality of the information shared. The onus for monitoring compliance lies with the partnering agencies. It is their duty to ensure their personnel use the shared ALPR data appropriately and not violate the terms of the agreement or applicable state laws.

#### **Concerns**

While state law clearly prevents the sharing of ALPR data with federal agencies, recent actions by the Trump administration raise concerns that the federal government may seek data from California law enforcement agencies. While the Los Angeles Times reported that Los Angeles County was not on the United States Department of Justice list of sanctuary jurisdictions published on August 5, 2025, 38 the federal government has already filed a lawsuit against the City of Los Angeles. 39 California is identified as one of 13 states that the Trump administration has flagged as having policies or laws that impede federal immigration agents. 40 An executive order titled *Protecting American Communities from Criminal Aliens* issued by the White House in April 2025, includes the suspension or termination of federal funding as a consequence for sanctuary jurisdictions that refuse to cooperate with federal immigration authorities. The Sheriff's Department's five-year retention policy potentially means that a huge amount of data could be shared with the federal government if a court were to decide that California law cannot forbid law enforcement agencies from sharing data with the federal government if the government demands access to the date for immigration enforcement.

Other concerns with the collection and storage of ALPR data involve what security protocols are in place to safeguard the data and how long the data is retained. A recent article in *The Guardian* illustrated how such data can potentially be used in a way that is antithetical with the original intent of the local law enforcement agency or municipalities that collect the data. ALPR systems capture images of vehicle activity, which can reveal travel patterns and even pinpoint a person's location at a specific time. In the case highlighted in the article, a sanctuary city in New York, had inadvertently shared its

<sup>&</sup>lt;sup>38</sup> Jenny Jarvie, <u>Justice Department releases a new list of sanctuary jurisdictions. L.A. County is not on it,</u> Los Angeles Times (August 5, 2025).

<sup>&</sup>lt;sup>39</sup> <u>United States of America v. City of Los Angeles, et al. U.S. District Court Case number 2:25-cv-05917.</u>

<sup>&</sup>lt;sup>40</sup> Jenny Jarvie, <u>Justice Department releases a new list of sanctuary jurisdictions. L.A. County is not on it,</u> Los Angeles Times (August 5, 2025).

ALPR data with the Department of Homeland Security, U.S. Immigration and Customs Enforcement (ICE), and Customs and Border Patrol by allowing them to continue to have access to its ALPR databases even after the city had passed laws prohibiting such sharing, raising concerns that these federal agencies could then track down persons using this information.<sup>41</sup>

Organizations such as the ACLU, Electronic Frontier Foundation, and even a state agency in California have expressed concerns about the use and storage of this data. In 2019, the California State Auditor conducted an audit of law enforcement agencies' use of ALPRs. The audit found that, despite the passage of relevant state legislation, many agencies did not have policies to dictate how personnel should handle the ALPR systems or how long the collected images should be stored. The report focused on four specific law enforcement agencies; the Sheriff's Department was not among them, although it did respond to the audit's survey on ALPR usage. 42 Based on the audit's recommendation, in October 2023, the California Department of Justice issued updated guidelines of how law enforcement agencies should write policies and dictate the use of ALPRs. 43 The CA-DOJ Bulletin, "California Automated License Plate Reader Data Guidance," Information Bulletin No. 2023-DLE-06 (October 27, 2023), has a link to a template for use by law enforcement agencies to create an ALPR policy that complies with state law. While the Sheriff's Department's policy contains many of the template policy provisions, it does not include a provision on sharing data only with public agencies as defined by Civil Code section 1798.90.5(f). There are also other areas where the Department could improve transparency and strengthen procedures to better protect citizens' privacy rights.

**Storing of Sensitive Data.** A key focus of the state audit report was the retention period for images captured by ALPR systems. These systems automatically photograph license plates, regardless of whether the vehicle is connected to any criminal activity. As a result, the vast majority of captured images involve individuals who are not suspected of wrongdoing. The audit found that as of 2019 the Los Angeles Police Department (LAPD) had accumulated over 320 million images in its ALPR database; yet, 99.9% "are for vehicles that were not on a hotlist when the image was made." At a 2014 court hearing, the LAPD and the Sheriff's Department reported that they collect an average of

<sup>&</sup>lt;sup>41</sup> Johana Bhuyian, "Ice accessed car trackers in sanctuary cities that could help in raids, files show," *The Guardian* (March 11, 2025).

<sup>&</sup>lt;sup>42</sup> California State Auditor, "Automated License Plate Readers to Better Protect Individuals' Privacy, Law Enforcement Must Increase Its Safeguards for the Data It Collects," Report Number 2019-118.

<sup>&</sup>lt;sup>43</sup> Press Release, "Attorney General Bonta Advises California Law Enforcement on Legal Uses and Management of Automated License Plate Recognition Data," California Department of Justice (October 30, 2023).

<sup>44</sup> Ibid.

3 million vehicle images per week using ALPR systems.<sup>45</sup> In an article authored by ACLU staff, the authors state "the ACLU has reported that only about .2% of plates scanned by ALPR systems are ever linked to any wrongdoing, and only 3% of those linked to wrongdoing (3 out of every 50,000 plates scanned) are linked to crimes other than licensing or emissions violations."<sup>46</sup> Given that the overwhelming majority of these images are unrelated to criminal investigation, storing them for them for five years creates a privacy risk.

Other states have adopted far stricter limits on ALPR data retention. For example, Maine, Georgia, New Hampshire, Montana do not permit long-term storage of such data. New Hampshire requires the data to be purged within 3 minutes of capture if no arrest is effectuated. AT California Highway Patrol (CHP) cannot retain the data for more than 60 days. Some of the Sheriff's Department's contract cities have also imposed stricter local restrictions. At a November 2024 Santa Clarita City Council meeting, the city unanimously approved \$500,000 in funding for ALPRs but included a condition that all captured images be deleted within 30 days.

Those in favor of longer retention periods may argue that complex crimes – such as money laundering or organized criminal racketeering may only become apparent over longer time frames, making extended data retention periods more important to solve these crimes. While there may be validity to this argument, there must be a careful balance between public safety and privacy. Given the sheer number of images the system collects, most of which pertains to individuals not involved in any criminal activity, it is worth questioning whether the prolonged retention is justified.

With the goal of determining the evidentiary value of retaining ALPR data for five years, an evaluation of the retention policy should be undertaken. Such an evaluation should examine whether older data assists with solving crimes or the apprehension of suspects.<sup>50</sup>

**Sharing of the Data with other California Law Enforcement Partners.** Criminal activity does not adhere to jurisdictional boundaries. For example, it is entirely plausible

<sup>47</sup> National Conference of State Legislatures, "Automated License Plate Readers: State Statues," NCLS, February 23, 2022.

<sup>&</sup>lt;sup>45</sup> Peter Bibring and Jennifer Lynch, Secrecy trumps public debate in new ruling on L.A.'s license plate readers, ACLU Southern California (September 3, 2014).

<sup>46</sup> Ibid.

<sup>&</sup>lt;sup>48</sup> See California Vehicle Code § 2400-2429.7.

<sup>&</sup>lt;sup>49</sup> Smith, Perry, "City OKs contract to help LASD with license-plate readers," *The Santa Clarita Valley Signal*, November 13, 2024.

<sup>&</sup>lt;sup>50</sup> The Department reports that shortening the retention period would not result in any cost savings despite the fact that a significant reduction in the retention period would mean fewer data would be stored.

and even likely, that a fleeing suspect may travel through multiple jurisdictions, moving from LAPD territory to Sheriff's Department territory, to San Bernardino Sheriff's territory. In such cases, interagency cooperation and data sharing are essential for tracking suspects, preventing further harm and effectuating arrests.

In January 2024, the ACLU sent a letter to California Attorney General Rob Bonta to alert him that more than a dozen law enforcement agencies had failed to comply with SB 34 regarding the proper handling of ALPR data.<sup>51</sup> The letter states that even nine years after SB 34's passage, a significant number of California law enforcement agencies continue to either refuse compliance or fall short of meeting the law's requirements. It should be noted that the Sheriff's Department was not among those agencies listed for non-compliance in the letter.

At this time, it remains unclear what actions, if any, the Attorney General has taken to address the concerns regarding non-compliance by certain law enforcement agencies, or whether the Attorney General's office has investigated and substantiated the claims made in the letter. Per the Sheriff's Department, agreements between the Sheriff's Department and other agencies are contingent upon those agencies adhering to state law and Sheriff's Department policies. If the state prosecutor determines that a partnering agency has failed to follow the law, the Sheriff's Department should take appropriate steps to terminate the sharing of ALPR data with that agency.

When the Sheriff's Department is the entity sharing the sensitive data, the onus is on the Department to routinely monitor and ensure that its partners comply with relevant laws and policies governing the handling of this sensitive information. Such monitoring should include implementing sunset clauses into the agreements with partnering agencies, which would force the parties to conduct periodic review of the terms of the agreement to ensure all parties are in compliance. Additionally, the Sheriff's Department should closely monitor actions taken by the Attorney General, so that if a law enforcement agency is found to be violating SB 34, other state laws, or Sheriff's Department policies, the Department can promptly terminate the data-sharing agreement.

#### Conclusion

ALPR technology is a valuable tool for solving crimes, which is why both the public and local governments have invested significant funds into purchasing and installing these systems. The same technology can also infringe on individuals' privacy rights if not used

<sup>&</sup>lt;sup>51</sup> ACLU to Attorney General Rob Bonta, <u>"Response to the Office of the Attorney General's Information Bulletin on the Sharing of ALPR Information by California Law Enforcement Agencies"</u> (January 31, 2024).

with proper oversight and safeguards. California's passage of SB 34 was meant to limit the sharing of ALPR data to only within the state of California as one way to protect the privacy rights of California residents.

The following recommendations are intended to ensure that Sheriff's Department explicitly include provisions required by state law, increase transparency, ensure the technology is being used for legitimate, lawful purposes, and help achieve the balance between privacy concerns and public safety priorities.

### *Recommendations*

- 1. The Sheriff's Department should revise its ALPR policies to include either a specific prohibition from sharing ALPR data with federal and out-of-state agencies or include that the data may only be shared with a public agency as defined in Civil Code section 1798.90.5(f).
- 2. The Sheriff's Department should revisit its policy of retaining ALPR images for five years after conducting a study on the benefit of a lengthy retention period as and the privacy issues created by the longer retention rate.
- 3. The Sheriff's Department should continue to conduct periodic audits to ensure that personnel are using the ALPR systems for authorized purposes. Audits should include a review of a sample of individual queries, requiring the auditors to assess whether the query was necessary for the investigation or case cited by the employee.
- 4. The Sheriff's Department should implement sunset clauses in its agreements with partnering agencies that receive ALPR data. These clauses would ensure that data-sharing agreements are subject to periodic review and renewal, rather than remaining in place indefinitely or for extended periods of time. At the time of renewal, the Sheriff's Department should thoroughly review the terms to confirm they still are aligned with current laws, policies, and best practices. Part of this review would require verification that the partnering agency has not been flagged by the Attorney General's Office for non-compliance with SB 34.

# Outstanding Requests to the Sheriff's Department

The Office of Inspector General made the following request for information to the Sheriff's Department for which responses are still outstanding:

 An April 18, 2025 request for additional materials responsive to a subpoena duces tecum that was served in October 2024 and included a request for all documents and information relating to any Sheriff's Department surveillance of any County oversight officials; this follow up request was made after it came to the Inspector General's attention that surveillance of a County oversight official was conducted but information relating to that surveillance, including notes and an audio digital tape of an interview, were not provided. Although the subpoena duces tecum was served on October 1, 2024, no notes have been provided regarding the work of two peace officers alleged to have engaged in surveillance. Despite repeated assurances that additional information would be provided, either by providing additional documents or acknowledging the documents that purportedly exist cannot be located, no additional information has been provided. Additional communications were sent to the Sheriff's Department regarding this outstanding request on May 16, 2025, June 12, 2025, and August 1, 2025.

### **CUSTODY DIVISION**

### **Jail Overcrowding**

As previously reported by the Office of Inspector General, overcrowding in the Los Angeles County jails continues to jeopardize the ability of the Sheriff's Department to provide humane conditions of confinement as required by the Eighth and Fourteenth Amendments to the U.S. Constitution.<sup>52</sup>

The Los Angeles County jails have a Board of State and Community Corrections (BSCC) total rated capacity of 12,404.<sup>53</sup> According to the Sheriff's Department Population Management Bureau Daily Inmate Statistics, as of June 30, 2025, the total population of people in custody in the Los Angeles County jails was 12,364. While the total population may not exceed the rated capacity, some facilities are over capacity.

The table on the next page shows the daily count of people in custody, according to the Population Management Bureau Daily Inmate Statistics, at Men's Central Jail (MCJ), Twin Towers Correctional Facility (TTCF), Century Regional Detention Facility (CRDF), Pitchess Detention Center – East (PDC-East), Pitchess Detention Center – North (PDC-North), Pitchess Detention Center – South (PDC-South), and North County Correctional Facility (NCCF) on the last day of the previous four quarters. On these dates, three

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<sup>&</sup>lt;sup>52</sup> See *Fischer v. Winter* (1983) 564 F. Supp. 281, 299 (noting that while overcrowding may not be unconstitutional in itself, overcrowding is a root cause of deficiencies in basic living conditions, such as providing sufficient shelter, clothing, food, medical care, sanitation, and personal safety).

<sup>&</sup>lt;sup>53</sup> The total rated capacity is arrived at by adding the rated capacity for each of the County jail facilities: MCJ 3512, TTCF 2432, CRDF 1708, PDC-East 926, PDC-North 830, PDC-South 782, and NCCF 2214. Some portions of the jail facilities are not included in the BSCC capacity ratings. When referring to the jail facilities, this report includes only the BSCC rated facilities. The rated capacity has not been recently updated and does not take into account the pandemic, understaffing, or the deteriorating physical plant of MCJ, meaning that the current safe capacity of the Los Angeles County jails is certainly substantially lower than the rated maximum.

facilities (MCJ, PDC-North, and NCCF) that together account for more than half the Department's jail capacity operated significantly over the BSCC rated capacity.

Facility	BSCC	Facility Count			
	Capacity	9/30/2024	12/31/2024	3/31/2025	6/30/2025
MCJ	3512	3698	3850	3793	3441
TTCF	2432	2378	2350	2314	2433
CRDF	1708	1371	1341	1418	1416
PDC-East	926	20	10	11	7
PDC-North	830	1276	1221	1286	1373
PDC-South	782	633	462	423	546
NCCF	2214	2718	2612	3010	3148

### **Availability of Menstrual Products in the Los Angeles County Jails**

On June 25, 2024, the Board of Supervisors (Board) passed a <u>motion</u> requesting the Sheriff's Department and directing the Office of Inspector General, Sybil Brand Commission, and the Sheriff Civilian Oversight Commission to review and report back on policies related to the availability and accessibility of menstrual products in the Los Angeles County jails, in light of recent legislation, and directing the Office of Inspector General to include status on the availability and accessibility of menstrual products in its quarterly reports to the Board, until further notice. <sup>54</sup>

The Sheriff's Department's report back to the Board on November 5, 2024, did not address security searches of menstruating people as requested by the Board's motion. In its initial <u>report back</u> to the Board, staff from the Office of Inspector General determined that issues persist with security search practices and recommended the Sheriff's Department establish specific policies for searching menstruating individuals in

<sup>54</sup> See Penal Code, § 4023.5(a). ("A person confined in a local detention facility shall be allowed to continue to use materials necessary for personal hygiene with regard to their menstrual cycle and reproductive system, including, but not limited to, sanitary pads and tampons, at no cost to the incarcerated person."); Cal. Code Regs., tit 15, § 1265. ("Each menstruating person shall be provided with sanitary napkins, panty liners, and tampons as requested with no maximum allowance."); Los Angeles County Sheriff's Department, Custody Division Manual, § 6-15/010.00 Inmate Clothing, Bedding, and Personal Hygiene. ("All menstruating inmates shall have ready access to sanitary napkins, panty liners, and tampons."); Los Angeles County Sheriff's Department, Custody Division Unit Orders, § 5-16-040 Distribution of Personal Care Items. ("Each menstruating inmate housed at CRDF shall be provided with sanitary napkins, panty liners, and tampons. All feminine hygiene products shall be readily available in a common space within each module or pod setting."); Penal Code, § 3409(a). ("A person incarcerated...who menstruates or experiences uterine or vaginal bleeding shall, without needing to request, have ready access to, and be allowed to use, materials necessary for personal hygiene with regard to their menstrual cycle and reproductive system, including, but not limited to, sanitary pads and tampons, at no cost to the person.").

jail facilities, ensuring that these policies protect their dignity while maintaining facility security.

In June 2025, Office of Inspector General staff re-examined the availability and accessibility of menstrual products in the search area in reception at CRDF. This inquiry also included a review of Sheriff's Department policies, discussions with CRDF leadership, facility visits and observations, and interviews of custody personnel and people in custody.<sup>55</sup>

**Search policy reforms.** In 2017, a court ruled in *Amador v. Baca* that strip searches conducted by the Sheriff's Department at CRDF violated incarcerated people's Fourth Amendment rights because they were conducted without reasonable suspicion and lacked privacy protections. <sup>56</sup> The searches were conducted in large groups, where individuals in custody were within view of one another, and involved degrading practices. The County agreed to pay a \$53 million settlement, which required the Sheriff's Department to implement policy reforms to improve privacy protections and uphold constitutional standards. <sup>57</sup>

Since then, the Sheriff's Department has taken steps to enhance privacy and sanitation, including adding curtains and providing trash bins. Despite progress, some practices still present the need for further improvement.

As previously reported, Sheriff's Department policy lacks guidance on how personnel should conduct body searches when a person is menstruating.<sup>58</sup> CRDF leadership has incorporated instructions to the Protocol for Inmate Searches Unit Order § 6-01-00 and added menstrual cups as another option.<sup>59</sup> The revised unit order is pending approval from Custody Support Services Bureau.

**Types of searches.** Custody personnel most commonly conduct pat-down and body scanner searches on people in custody. When the body scanner is used, menstruating individuals are required to remove their pad or tampon. When body scanners are inoperable, pat-down searches, which currently do not require the removal of menstrual products, are most commonly conducted, though a facility unit order permits visual body

<sup>&</sup>lt;sup>55</sup> Staff from the Office of Inspector General visited modules 1600 (disciplinary housing), 2700 and 3600 (general population housing), 1300 (FIP Stepdown program and high observation housing), 2100 (restrictive housing), 2400 (high observation housing), and 3100 and 3400 (moderate observation housing).

<sup>&</sup>lt;sup>56</sup> Amador v. Baca, No. 2:10-cv-01649 (C.D. Cal. Mar. 5, 2010), https://clearinghouse.net/case/14457/.

<sup>&</sup>lt;sup>57</sup> The settlement included monetary compensation for affected individuals incarcerated at CRDF between March 2008 and January 2015, <a href="http://shq.lasdnews.net/content/uoa/AS1/Class">http://shq.lasdnews.net/content/uoa/AS1/Class</a> Notice.pdf.

<sup>&</sup>lt;sup>58</sup> See Los Angeles Sheriff's Department, Custody Division Manual, § 5-08/010.00, Searches.

<sup>&</sup>lt;sup>59</sup> See Los Angeles County Sheriff's Department, Custody Division Unit Order, § 6-01-00 *Protocol for Inmate Searches Unit Order*. Unit order obtained via email message.

cavity searches as well.<sup>60</sup> More invasive searches, such as strip or physical body cavity searches, are carried out under limited conditions and must follow specific privacy, medical and documentation protocols.<sup>61</sup>

**Search procedures upon facility re-entry.** Upon returning to CRDF, individuals in custody are placed in a pre-search holding tank in reception. The length of time spent there varies depending on staffing levels and other operational demands. When personnel conduct searches, individuals are lined up outside the holding tank and are escorted to the search area where they are directed to stand behind a table. Custody personnel then instruct the group to untuck their shirts, empty their pockets, place any belongings on the table, remove their shoes and socks, and, if applicable, remove any menstrual products.

Menstruating individuals are directed to discard used pads or tampons in a trash bin located underneath the table.<sup>62</sup> Curtains on the left and right sides of each station offer partial privacy from others in custody; however, the front of the partition remains open to allow deputies to maintain a direct line of sight throughout the process.<sup>63</sup> After all property is searched, incarcerated individuals are allowed to put on their socks and shoes to line up before walking through the scanner. Wait times vary, depending on the number of people being screened, which may be up to 12, and any issues that cause delays affecting the entire group.

Following the scan, individuals must stand by until custody personnel have reviewed and cleared the images. If a menstruating individual does not remove their pad or tampon, the body scanner typically detects it, prompting deputies to instruct the person to remove the product and rescan. If the body scanner continues to reveal an anomaly, the individual may be subjected to a pat-down search, and, if necessary, a more

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<sup>&</sup>lt;sup>60</sup> Custody Division Unit Order, § 6-01-00 Protocol for Inmate Searches Unit Order. Unit order obtained via email message.

<sup>&</sup>lt;sup>61</sup> Custody Division Manual, § 5-08/010.00, *Searches*; Custody Division Unit Order, § 6-01-00 *Protocol for Inmate Searches Unit Order*. Unit order obtained via email message.

<sup>&</sup>lt;sup>62</sup> At least two individuals reported inconsistencies in the enforcement of menstrual product removal: one stated the body scanner did not detect her product when she chose not to remove it, and another noted she was not instructed to remove hers on at least three separate occasions. Other individuals reported that menstruating people who refuse to remove their pad or tampon may face disciplinary action. One person stated she witnessed someone being sent to discipline for refusing to remove her menstrual product.

<sup>&</sup>lt;sup>63</sup> At least one person reported that deputies stood and stared while they removed their menstrual product, raising concerns about privacy. Another person reported that some deputies do not allow menstruating individuals to use the privacy curtains when removing their menstrual product.

invasive search.<sup>64</sup> Once cleared, menstruating individuals should receive access to pads and tampons and may return to the curtained area to use the product.

Sometimes, everyone must wait in the search area until the entire group is scanned and cleared before moving to a holding tank. Other times, individuals can proceed to the holding tank as soon as they are cleared. Regardless, individuals face another wait before returning to their assigned housing unit. Multiple waiting periods pose a significant issue for those who are not immediately provided a new menstrual product after being scanned.

Provision of menstrual products and access to handwashing. Incarcerated individuals again reported inconsistent access to menstrual products after body scanner searches and to clean clothing if they experienced staining during the search. Some stated they were given a pad or tampon immediately after the search, but only upon making a verbal request. A few mentioned they were able to take a product from a table next to the body scanner, while others reported they had to wait until they returned to a holding tank or their assigned housing location, which could take anywhere from a few minutes to several hours. A common concern among incarcerated individuals was the inconsistent replenishment of menstrual products in the search area and the lack of access to hand sanitizer or soap during the search process.

In July 2025, the Sheriff's Department installed hand sanitizer and paper towel dispensers in each search partition to support an updated process. Under the revised unit order on searches, pat-down searches will now be conducted on all individuals before they pass through the body scanner. Menstruating individuals will be required to remove their menstrual product prior to the pat-down search and, immediately afterward, be provided a new product and underwear and allowed to sanitize their hands before proceeding through the body scanner. These changes aim to reduce multiple waiting periods without menstrual protection, increase access to sanitation, and maintain safety and security in custody.

<sup>&</sup>lt;sup>64</sup> One individual reported that in March 2025, she was subjected to a more invasive search requiring her to squat and cough, after custody personnel suspected she was concealing contraband. She stated that she was made to pass through the body scanner more than 10 times and was told she would be placed on contraband watch. She also reported being sent to disciplinary housing for 28 days. The Office of Inspector General was unable to verify the account

<sup>&</sup>lt;sup>65</sup> One person shared they were given a new pair of pants following a heavy menstrual flow. In contrast, several others reported it is common for menstruating individuals to stain their underwear and pants during the body scanner search process, with no assurance of receiving clean clothing. Some reported they must wait until the scheduled clothing exchange to obtain replacements.

<sup>&</sup>lt;sup>66</sup> Several incarcerated individuals reported needing to wait until they returned to the holding tank in reception to wash their hands with water.

**Recommendations.** The Office of Inspector General recommends that the Sheriff's Department finalize updates to the Protocol for Inmate Searches Unit Order § 6-01-00 and ensure that hand sanitizer, paper towels, and menstrual products are replenished regularly and as needed in the search area. Additionally, custody personnel should be reminded that menstruating individuals may partially close curtains to maintain privacy from other incarcerated individuals and unauthorized personnel. Resources permitting, the Sheriff's Department should also consider making individual determinations about whether all menstruating individuals, such as those who experience heavier flows and have no disciplinary history, need to remove their pad or tampon.

### **Commissary Prices**

### **Background**

On July 9, 2024, the Board of Supervisors passed a motion directing the Sheriff's Department to report back on measures taken to ensure commissary prices in the Los Angeles County Jails are not excessive and remain comparable with prices for groceries and other retail outlets. The motion directed the Office of Inspector General to review the Sheriff's Department's report back and provide an assessment, which was issued on February 6, 2025, entitled Report Back on People Over Profit: Fairness and Equity in Commissary Prices for the Los Angeles County Jails. The motion also directed the Office of Inspector General to provide quarterly updates on the Sheriff's Department's progress on the removal of the profit mark-ups and reduction of prices on commissary items.

Since 2013, the Sheriff's Department has used a private, third-party contractor, Keefe Commissary Network (Keefe), to provide items to sell in the jail commissaries and vending machines. The contract between Keefe and the Sheriff's Department was set to expire this year. In the Report Back on People Over Profit: Fairness and Equity in Commissary Prices for the Los Angeles County Jails, the Office of Inspector General recommended that rather than renewing the contract with Keefe, the Department should issue a request for proposals to provide commissary goods under the fair and equitable approach the Board has requested.

In January 2024, the County prepared a Request for Proposals for Inmate and Commissary and Vending Services (RFP No. 252-SH). The timetable in the RFP

<sup>&</sup>lt;sup>67</sup> As previously recommended by the Office of Inspector General, policy may be communicated temporarily through a Unit Order; however, best practices dictate that such orders be implemented in as policy in the Custody Division Manual or the Manual of Policy and Procedure to ensure clearer communication to all Sheriff's staff.

provided that the proposals were due on May 10, 2024. The RFP was presented at the <u>Public Safety Cluster Agenda Review on May 14, 2025</u>, and although there were three vendors that attended a mandatory proposers' meeting, Keefe was the only vendor that submitted a proposal. The <u>new contract with Keefe</u> was approved by the Board at the <u>June 3, 2025 Board of Supervisors meeting</u>, allowing Keefe to continue providing commissary and vending services for the Department for an initial term of six years, with four one-year extension options.<sup>68</sup>

### **Contract Provisions - Pricing and Contractor Obligations**

The Office of Inspector General reviewed the new Keefe contract to analyze efforts to reduce commissary prices and examine whether the Department incorporated the recommendations made in the Office of Inspector General's <u>Report Back on People Over Profit: Fairness and Equity in Commissary Prices for the Los Angeles County Jails.</u>

The contract includes a pricing provision regarding retail price benchmarking. Apart from some specialty items (which require manufacturer documentation), Keefe must price all products equal to or lower than the average retail prices from three local full-service retailers (excluding gas stations, mini-marts, or convenience stores). The new contract also requires Keefe to apply a 2% discount to all product prices, based on the approved retail average or manufacturer pricing.

The following compares prices for basic hygiene products between the previous period and new commissary contract with Keefe:

Item Name (Item No.)	Sales Price to Inmates FY 2024-2025	Sales Price to Inmates FY 2025-2026 (includes 2% rebate)	Price Change from FY 2024-2025
Shampoo 4 oz (0001)	\$2.75	\$3.19	Increase of \$0.44 (+16.22%)
Dandruff Shampoo 4 oz (0020)	\$3.95	\$3.92	Decrease of \$0.03 (-0.54%)
Toothbrush Flexible Security (0058)	\$1.25	\$1.25	No change
Freshscent Deodorant Push Up 1.6 oz. (0133)	\$3.85	\$3.50	Decrease of \$0.35 (-10%)
Skin Care Lotion 4 oz (0210)	\$3.85	\$3.53	Decrease of \$0.32 (-12.73%)

<sup>&</sup>lt;sup>68</sup> See Item 74 of the June 3, 2025 Board of Supervisors meeting, which includes as an attachment, the Sheriff's Department's Board Letter containing the new contract provision.

Cocoa Butter Lotion	\$3.85	\$3.25	Decrease of \$0.60
4 oz (0215)			(-20.44%)
Irish Spring Soap 3.2 oz (0400)	\$1.45	\$1.26	Decrease of (\$0.19) (-18.29%)
Colgate Toothpaste Regular 1 oz (0518)	\$2.25	\$1.39	Decrease of (\$0.86) (-18.29%)
Freshmint Toothpaste 2.75 oz (0538)	\$4.75	\$4.35	Decrease of (\$0.40) (-18.29%)
Security Razor 1 each (0935)	\$0.61	\$0.78	Increase of \$0.17 (+12.73%)

Looking at the new contract prices, the following highlights the difference between the sales prices to inmates and the listed retail prices:<sup>69</sup>

Item Name (Item No.)	Sale Price to Inmates FY 2025-2026 (includes 2% rebate)	Retail Price	Difference
Shampoo 4 oz (0001)	\$2.75	\$5.99	+\$0.44 (+16.22%)
Dandruff Shampoo 4 oz (0020)	\$3.95	\$4.49	-\$0.03 (-0.54%)
Toothbrush Flexible Security (0058)	\$1.25	Not available on the retail market	N/A
Freshscent Deodorant Push Up 1.6 oz. (0133)	\$3.85	\$2.49	-\$0.35 (-10%)
Skin Care Lotion 4 oz (0210)	\$3.85	\$3.79	-\$0.32 (-12.73%)
Cocoa Butter Lotion 4 oz (0215)	\$3.85	\$2.49	-\$0.60 (-20.44%)
Irish Spring Soap 3.2 oz (0400)	\$1.45	\$1.44	-\$0.19 (-18.29%)
Colgate Toothpaste Regular 1 oz (0518)	\$2.25	\$1.29	-\$0.86 (-18.29%)
Freshmint Toothpaste 2.75 oz (0538)	\$4.75	\$2.29	-\$0.40 (-18.29%)
Security Razor 1 each (0935)	\$0.61	Not available on the retail market	N/A

The contract also requires Keefe to attend monthly Title 15 meetings convened by the County to present reports on commissary and vending sales trends and spikes, billing issues, relevant complaints submitted by incarcerated people, machine maintenance and reliability, security concerns, and any other operational problems identified by the

<sup>&</sup>lt;sup>69</sup>Board Letter, Commissary and Vending Product Master List, Attachment F at pg. 63.

parties. Keefe is also required to submit at the end of each contract year, and annually thereafter, a detailed cost comparison for all products, including documentation for any requests for price adjustments. The Office of Inspector General recommends our office attend those meetings and review the documentation to evaluate efforts between the parties to carry out the contract in alignment with the contract terms and the Board of Supervisors' directives. And while we do see a decrease in most prices, the Office of Inspector General continues to recommend that the Department audit the pricing structure and documentation provided by Keefe to identify any inequitable pricing markups.

### Revenue Sharing and the Inmate Welfare Fund

Both the prior and new contract with Keefe allocate revenue sharing between Keefe and the Sheriff's Department's Inmate Welfare fund (IWF). Nationwide, prison and jail commissaries sell goods with several jurisdictions using profits from their commissaries to supply inmate welfare funds - pools of money used to support programming or services for incarcerated persons. California originally established inmate welfare funds by statute in 1949 for the "benefit, education, and welfare" of incarcerated persons, and later expanded the permissible use to include "required county expenses as determined by the sheriff to be in the best interest of inmates."

The Sheriff's Department indicated in its October 30, 2024 report that under the prior contract, the revenue sharing between Keefe and the IWF started as a split of commissionable revenue with 53% to the IWF and 47% to Keefe. In August of 2024, the revenue sharing was adjusted lowering the share allocated to the IWF to 51.5%. Under the new contract, 39% of gross commissary and vending sales will be deposited into the IWF, so while there is improvement in the new contract, the Office of Inspector General continues to recommend that the Department limit the markup of commissary items to the amount attributable to Keefe's profit and forgo the portion of the revenue generated by the contract for the IWF and pass along the savings directly to persons in custody. Funding for jail maintenance, programming, and for the welfare of persons in custody should be part of the Sheriff's Department budget allocated from County resources.

### **Resources for Indigent Persons in Custody**

Per the contract with Keefe, certain commissary resources are made available for indigent inmates (an inmate is considered indigent if their trust account balance is below \$2.00 at the time of purchase/order.) Once a week, indigent persons in custody may

<sup>&</sup>lt;sup>70</sup> Penal Code § 4025(e).

receive a hygiene maintenance kit and an indigent kit by submitting a commissary order form. The kits include items such as stamped envelopes and paper, shampoo, deodorant, with items subject to change based on housing location and/or medical restrictions. Additionally, one pair of reading glasses may be requested once every three months. Because these kits are necessary for basic hygiene, the Office of Inspector General recommends that all persons in custody be provided these kits free of charge.

As to pro-per inmates representing themselves in legal matters, indigent pro-per inmates may request one pro-per kit per week, submitted via the Department's legal unit, which forwards orders to Keefe for processing and delivery during regular commissary cycles. The pro-per kit includes materials such as pencils, legal pads, and envelopes.

## **Vending Services and Other Transaction Fees**

As noted, Keefe provides commissary goods, as well as items for sale in vending machines. While Keefe completes installation of new vending machines, the contract requires the temporary sale of vending debit cards as an interim solution. The cards must be sold in \$10 and \$20 denominations, persons in custody are allowed a maximum of four cards per week (not to exceed \$60 total), and Keefe may charge a handling fee of up to \$0.75 per card. Vending debit cards are exempt from state and local sales tax, and purchase of vending debit cards count towards the \$300 weekly inmate spending limit; inmates are limited to \$300 per week for all purchases made through scantron or tablet app orders, including sales tax. The County will routinely collect used vending cards and refund any remaining balances to the associated person's trust account. Keefe must also advise inmates three weeks prior that new machines will be operational and the temporary vending debit cards will no longer be accepted.

Regarding web-based commissary orders, the contract sets a maximum transaction fee of \$2.00 for each order that may not be increased for the duration of the contract (including the optional extensions). The contract also limits the transaction fees Keefe may charge for inmate account deposits and kiosk-based inmate trust account deposits.

In the <u>Report Back on People Over Profit: Fairness and Equity in Commissary Prices for the Los Angeles County Jails</u>, the Office of Inspector General recommended the Department evaluate whether certain purported costs borne by Keefe may be absorbed by the Department as a cost-saving measure. The \$0.75 fee for purchase of temporary vending debit cards, the \$2.00 web-based transaction fee, and the fees for inmate account and kiosk-based inmate trust account deposits may be examples of costs the

Department should consider covering via their own budget, rather than imposing such costs upon people in its custody.

# Compliance with the Settlement Agreement in *Johnson v. Los Angeles Sheriff's Department* for People in Custody with Mobility Impairments

The Office of Inspector General serves as the court-appointed monitor for the *Johnson v. Los Angeles County Sheriff's Department* class-action lawsuit, in which a class of people (class members) with mobility impairments in Los Angeles County Jails alleged that the Sheriff's Department denied them accommodations or provided inadequate accommodations, inappropriately segregated them, excluded them from jail programs and services, and subjected them to multiple and pervasive physical access barriers throughout the facilities. <sup>71</sup> The Sheriff's Department entered into a settlement agreement ("agreement") in 2015 to resolve the lawsuit and agreed to implement systemwide reform of the conditions of confinement for people with mobility impairments. The Office of Inspector General filed its *Ninth Implementation Status Report* on May 13, 2025, and reported that of the seven provisions that remain in effect, the Sheriff's Department has achieved substantial compliance with one, and partial compliance with six. <sup>72</sup>

Although progress has been made in improving the conditions that gave rise to the agreement over the 10 years it has been in effect, the Office of Inspector General's report identified notable issues that erode the Sheriff's Department's reform efforts and make it unlikely that the Sheriff's Department will achieve compliance on the remaining provisions without additional extensions of its settlement term.<sup>73</sup>

First, the Sheriff's Department continues to expand the areas where it houses class members in Men's Central Jail and Twin Towers Correctional Facility into non-ADA housing areas. Class members in these areas face architectural barriers that pose safety risks and yet have not been provided with adequate accommodations, and in some cases were denied accommodations, that would have enabled their mobility

<sup>&</sup>lt;sup>71</sup> Johnson v. Los Angeles County Sheriff's Department, Case No. CV 08-03515 DDP (C.D. Cal. Filed May 29, 2008).

<sup>&</sup>lt;sup>72</sup> The agreement contains a total of 49 provisions. Pursuant to stipulation of the Parties, the Court has severed 38 of the 49 provisions from the agreement that have either achieved sustained compliance or were documented as "completed" during settlement negotiations and are no longer subject to monitoring by the Office of Inspector General. Four additional provisions have achieved sustained compliance but have not been severed from the agreement.

<sup>&</sup>lt;sup>73</sup> The agreement, which took effect on April 22, 2015, was originally set to expire on April 22, 2018. The parties have stipulated to, and the court approved, several extensions of settlement term, most recently extending the settlement term by one year to May 30, 2026.

despite the architectural barriers. For example, many of these housing areas lack access features such as grab bars and benches in the showers, making it difficult for mobility impaired class members to steady themselves while showering. Some class members reported difficulties with entering and exiting the shower areas due to the presence of a raised threshold at the bottom of the entrance designed to keep water in the shower basin. Office of Inspector General staff spoke with four class members who reported slipping and falling while showering. All four class members reported having to use non-accessible showers due to custody staff not always providing them with the opportunity to use the ADA showers. Office of Inspector General staff reviewed medical records and identified documentation reflecting that two of the four class members reported the slip-and-fall injury to medical staff and received medical treatment.<sup>74</sup>

Class members housed on the 5000 floor of Men's Central Jail, a non-ADA housing area, reported having issues traveling to and from their housing locations. Class members housed on the 5000 floor must descend approximately 60 stairs on narrow escalators that are regularly out of service to get to the bus bays to attend court and must ascend the same escalator stairs to return to their housing location. Several class members reported declining yard time and, in some cases, medical appointments, due to their inability to descend and ascend the escalators. One class member reported tripping and falling on the escalators while going to court. Office of Inspector General staff reviewed medical records and identified documentation reflecting that the class member reported the fall to medical staff and received medical treatment.

Despite the Office of Inspector General's prior reporting in its <u>Eighth Implementation</u> <u>Status Report</u> on the issues stemming from the expansion of housing areas, the Sheriff's Department made little to no progress in addressing mobility concerns and ADA compliance in non-ADA housing areas. The Office of Inspector General stressed the need for the Sheriff's Department, in collaboration with Correction Health Services ("CHS"), to conduct a comprehensive assessment of its class member population to ensure that it houses all class members in appropriate areas of the jails and provides all necessary accommodation in accordance with the terms of the agreement.

Second, the Office of Inspector General staff encountered several class members who had a classification code for a mobility assistive device but had not received their prescribed device(s). Office of Inspector General staff spoke with 27 class members who reported not having received their prescribed device and confirmed that 11 had active medical orders for the device they reported not having at the time they spoke with

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<sup>&</sup>lt;sup>74</sup> It is important to note the Office of Inspector General does not discredit the information from class members on the basis that the injury was not reported to medical staff.

Office of Inspector General staff. Several class members we spoke with had a mobility assistive device but were not assigned the corresponding classification code. In speaking with medical and custody staff regarding this concern, the Office of Inspector General learned that prescriptions for mobility assistive devices are not actively monitored, resulting in delays in the removal of devices once prescriptions expire and secondary review options are exhausted. Medical and custody staff explained there is no established process for removing devices from Class Members, or clarity as to who is responsible for doing so, indicating a lack of collaboration or cooperation between the Sheriff's Department and CHS.

Third, although the Sheriff's Department has made progress towards compliance with two provisions on the processing of ADA-related grievances, it failed to meet the compliance standards required to achieve substantial compliance. This was, in large part, due to (1) CHS' failure to designate ADA-related grievances correctly, hampering any progress achieved by the Sheriff's Department, (2) methodological issues that impacted the accuracy of the Sheriff's Department's self-assessments that are used by the Office of Inspector General to make compliance determinations, and (3) not fully addressing all components of a grievance to ensure that it is adequately responded to.

Based on the findings in the *Ninth Implementation Status Report*, the Office of Inspector General recommends that the Sheriff's Department and CHS ensure that adequate resources are dedicated towards implementing the terms of the agreement. In addition, the Sheriff's Department and CHS should take more active roles in overseeing compliance and focus on collaboration and agreement between the two agencies. Defendants should also continue to train and brief all personnel who work in the custody setting on the terms of the agreement.

# **Jail Employment Opportunities at Century Regional Detention Facility**

The Office of Inspector General continues to monitor Century Regional Detention Facility's (CRDF) efforts to provide meaningful opportunities for people in custody to participate in therapeutic and rehabilitative programming.

In 2021, the Office of Inspector General issued a <u>report</u>, finding inequitable racial/ethnic representation of people in custody at CRDF participating in credit-earning jail employment through the Prisoner Personnel Office (PPO). The Office of Inspector General has monitored racial/ethnic representation of inmate workers since, and Black women continue to be consistently underrepresented.

The Sheriff's Department provided data from June 24, 2025, detailing the number of people in custody at CRDF engaged in credit-earning jail employment by race/ethnicity. A percentage comparison analysis displayed representation percentages similar to those reported in previous Office of Inspector General reports. Specifically, the data showed:

- Approximately 13% of Inmate Workers were White, compared to approximately 18% of the CRDF population.<sup>75</sup>
- Approximately 19% of Inmate Workers were Black, compared to approximately 33% of the CRDF population.
- Approximately 66% of Inmate Workers were Hispanic, compared to approximately 46% of the CRDF population.
- Approximately 4% of Inmate Workers were "Other" race/ethnicity, compared to approximately 4% of the CRDF population.

In 2022, the Office of Inspector General <u>recommended</u> that the Sheriff's Department "implement a system that documents reasons for denial of PPO participation, documents reasons for elective non-participation, explore ways to promote PPO participation for eligible persons, and explore alternative ways of evaluating persons for PPO to provide equitable opportunity for participation." That recommendation has not been implemented.

Despite the former Assistant Sheriff for the Custody Division stating in January 2023 that "more follow-up" was necessary to address the issue, the PPO has not made observable efforts to address racial/ethnic disparity for people in custody to be given the opportunity for employment as Inmate Workers. Recently, the Department informed us of plans to expand data tracking to document PPO denial and refusals, increase PPO recruitment efforts, and potentially revise criteria that may disqualify people from participating in PPO. A timeline for implementation was not provided.

## **In-Custody Deaths**

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Between April 1 and June 30, 2025, eight people died in the care and custody of the Sheriff's Department. The Department of Medical Examiner's (DME) website currently reflects the manner of death for seven deaths: two natural, one accidental, and four suicides. There were no homicides. For the one remaining death, the DME finding is

<sup>&</sup>lt;sup>75</sup> Race/ethnicity categorizations reflect those utilized by the Sheriff's Department when reporting demographic data.

deferred.<sup>76</sup> One person died at MCJ, one person died at CRDF, one died at IRC, and five people died at hospitals after being transported from the jails. The Sheriff's Department posts the information regarding in-custody deaths on a <u>dedicated page on Inmate In-Custody Deaths on its website</u>.<sup>77</sup>

Office of Inspector General staff attended the Custody Services Division Administrative Death Reviews for each of the eight in-custody deaths. The following summaries, arranged in chronological order, provide brief descriptions of each in-custody death:

Date of Death: April 3, 2025 Custodial Status: Sentenced

On March 26, 2025, CHS staff at MCJ responded to a health emergency in a single-person cell. The person was transported to Los Angeles General Medical Center (LAGMC) for medical care. Approximately seven hours later, the person was transported back to MCJ. Within an hour and a half of being back at MCJ, the person was found hanging and unresponsive in a single person cell. Custody staff, CHS staff, and paramedics rendered emergency aid, and CHS staff administered two doses of Narcan. The person was transported to LAGMC for a higher level of care where the person died. Areas of concern include adherence to procedures for hospital returnees, Behavioral Observation and Mental Health Referral process, temporary housing of people in custody referred to mental health, and handling of suicidal behavior. The preliminary cause of death according to the hospital is brain death due to anoxic brain injury due to asphyxiation due to hanging. The DME website currently reflects the manner of death as a suicide, and the cause of death as hanging.

Date of Death: April 19, 2025 Custodial Status: Pre-Trial

On April 19, 2025, a person in custody who was found disheveled and refusing to engage in their single person cell was transported from TTCF to LAGMC for a higher

<sup>&</sup>lt;sup>76</sup> In the past, the Office of Inspector General has reported on the preliminary cause of death as determined by the Medical Examiner, Correctional Health Services (CHS) personnel, hospital personnel providing care at the time of death, and/or Sheriff's Department Homicide investigators. Because the information provided is preliminary, the Office of Inspector General has determined that the better practice is to report on the manner of death. There are five manner of death classifications: natural, accident, suicide, homicide, and undetermined. Natural causes can include illnesses and disease and thus deaths due to COVID-19 are classified as natural. Overdoses may be accidental, or the result of a purposeful ingestion. The Sheriff's Department and Correctional Health Services use evidence gathered during the investigation to make a preliminary determination as to whether an overdose is accidental or purposeful. Where the suspected cause of death is reported by the Sheriff's Department and CHS, the Office of Inspector General will include this in parenthesis.

<sup>&</sup>lt;sup>77</sup> Penal Code § 10008 requires that within 10 days of any death of a person in custody at a local correctional facility, the facility must post on its website information about the death, including the manner and means of death, and must update the posting within 30 days of a change in the information.

level of care. Upon arrival to LAGMC, hospital staff were unable to locate the person's pulse, and the person died. Areas of concern include poor cell condition and medical provider referral upon intake. Preliminary manner of death: unknown. The DME website currently reflects the manner of death as natural, and the cause of death is Atherosclerotic and Hypertensive Cardiovascular Disease.

Date of Death: April 26, 2025 Custodial Status: Pre-Trial

On April 26, 2025, a person in custody was found hanging and unresponsive in a single-person cell at MCJ. Custody staff, CHS staff, and paramedics rendered emergency aid, and CHS staff administered three doses of Narcan. The person died at the scene. Areas of concern include quality of Title 15 Safety Checks, adherence to wristband count procedures, and inability to live monitor linear rows. Preliminary manner of death: apparent suicide by hanging. The DME website currently reflects the manner of death as a suicide, and the cause of death as hanging.

Date of Death: May 6, 2025 Custodial Status: Pre-Trial

On April 27, 2025, a person in custody was found hanging in a single-person cell at MCJ. Custody staff arrived, removed the noose, and rendered emergency aid. The person was transferred to LAGMC for a higher level of care. On May 2, 2025, the person was compassionately released from Sheriff's Department custody. Despite efforts by hospital staff, the person died on May 6, 2025. The DME website currently reflects the manner of death as a suicide, and the cause of death as sequelae of hanging.

Date of Death: May 7, 2025 Custodial Status: Sentenced

On May 7, 2025, a person in custody was found unresponsive in a multi-person holding cell at IRC Old Side. Custody staff, CHS staff, and paramedics rendered emergency aid, and custody and CHS staff administered seven doses of Narcan. The person died at the scene. Areas of concern include quality and timeliness of Title 15 Safety Checks, Narcan availability, automated external defibrillator (AED) availability, proper radio frequency during emergency response, mental health staffing levels, and referrals to Addiction Medicine Services. The preliminary cause of death is urine positive for fentanyl. The DME website currently reflects the manner of death as an accident, and the cause of death as effects of fentanyl.

Date of Death: June 2, 2025 Custodial Status: Pre-trial

On May 24, 2025, a person in custody was transferred from IRC to LAGMC for a higher level of care due to a pre-existing medical condition. On June 2, 2025, the person died while receiving medical treatment. The preliminary cause of death according to the hospital is oropharyngeal (tonsil) cancer. The DME website currently reflects the manner of death as natural, and cause of death as sequelae of oropharyngeal cancer.

Date of Death: June 14, 2025 Custodial Status: Sentenced

On June 14, 2025, a person in custody was found unresponsive in a single-person cell at CRDF. Custody staff, CHS staff, and paramedics rendered emergency aid, and CHS staff administered three doses of Narcan. The person died at the scene. Areas of concern include quality of CHS provider evaluations, Title 15 Safety Checks, and timing of emergency response. The DME website does not currently reflect the manner of death, and the cause of death is deferred.

Date of Death: June 18, 2025 Custodial Status: Pre-trial

On June 17, 2025, a person in custody was found hanging and unresponsive in a cell at Clara Shortridge Criminal Justice Center. Custody staff rendered emergency aid while paramedics were summoned. Paramedics continued resuscitative efforts and transported the patient to LAGMC. On June 18, 2025, the patient showed no signs of life and was pronounced dead by a LAGMC physician. Areas of concern involve a delay in rendering initial medical aid. The DME website currently reflects the manner of death as suicide, and the cause of death as hanging.

# **In-Custody Overdose Deaths in Los Angeles County Jails**

On December 19, 2023, the Board of Supervisors <u>passed a motion</u> directing the Sheriff's Department to "[c]ollect and track data outlining narcotics recovery in county jail facilities to evaluate the efficacy of drug detection interventions and provide information to the OIG," and [s]trengthen existing policy on increasing and conducting more comprehensive searches of the belongings of staff and civilians who enter the facility, beyond visual inspections." The Board also directed the Office of Inspector General to report quarterly on the Sheriff's Department's progress on these mandates, including progress or any recommendations included in Office of Inspector General reports, as well as on the number of in-custody deaths confirmed or assumed to be due to an overdose, and on any additional recommendations related to in-custody overdose deaths.

Of the eight people who died in the care and custody of the Sheriff's Department between April 1 and June 30, 2025, the medical examiner's final reports, including toxicology assessments, confirm that one person died due to an accidental overdose. Toxicology results remain pending for one of the eight deaths and may indicate an additional overdose death once completed. As of this report, the DME has confirmed that seven individuals have died due to accidental overdose through the second quarter of 2025.

### **Tracking Narcotics Intervention Efforts**

With regard to the directive to the Sheriff's Department to track narcotics recovery and evaluate drug detection interventions, as previously reported the Sheriff's Department does not presently track narcotics detection in a format that allows data to be analyzed and reports that it does not have the capacity to build a mechanism to track narcotics seizure by drug detection mechanism, nor is it able to compile extractable data collected in the Los Angeles Regional Crime Information System (LARCIS) to evaluate the efficacy of drug detection intervention. Instead, the Sheriff's Department takes the position that constructing an all-encompassing jail management data system would best support the Sheriff's Department's efforts to track narcotics recovery and evaluate the efficacy of drug detection interventions. The Office of Inspector General continues to recommend that the Sheriff's Department examine ways to comply with the Board's directive by standardizing search procedures division-wide, improving reporting requirements for staff, and compiling data on detection interventions and seizures using existing technologies.

### **Improving Searches of Staff and Civilians**

The Board's second directive requires that the Sheriff's Department "[s]trengthen existing policy on increasing and conducting more comprehensive searches of the belongings of staff and civilians who enter the [jails]." The Sheriff's Department previously reported that its current policy grants the Sheriff's Department broad authority to search staff and civilians entering the jails, so that no changes to existing policy are required to implement more comprehensive searches. The Sheriff's Department previously reported that it implemented more frequent unannounced and randomized staff searches beginning in May 2024.

**Search practices.** All seven facilities conduct searches of staff and civilians; however, as previously reported, the frequency of searches and search procedures vary by facility. Searches of Sheriff's Department and CHS staff are typically conducted by

supervisory personnel, namely sergeants,<sup>78</sup> at shift change near the main control entry. While K-9s may be present during searches, they do not search staff, civilians, or their property bags as they enter the facility. Targeted searches based on credible and actionable intelligence are overseen by the Internal Criminal Investigations Bureau.

Sheriff's Department policy allows staff and civilians to bring into the facility one clear backpack and one clear bag or lunch box, within specified dimensions, with an exception for Department-issued equipment and carrying bag. <sup>79</sup> Most facilities rely on informal enforcement of bag size limits. During routine searches, staff may be directed to shuffle through property or retrieve certain items from their bag. Only one facility reported that sergeants directly handle staff's property during searches, and even then, the practice occurs sporadically. One facility reported that civilians are infrequently searched because of varied arrival times and lack of resources, which is a violation of Sheriff's Department search policy.

The need for more robust search practices exists and most facilities reported no known search restrictions by the Association for Los Angeles Deputy Sheriffs (ALADS).

**Data collection.** Search data is entered in the Custody Watch Commander's Log (CWCL) at each facility. The Custody Support Services Bureau (CSSB) can extract data directly from the CWCL or request it from facility operations staff. Collection methods vary by staff conducting the search, thus affecting the data entered in the CWCL The data typically includes the time, date, and shift of each search, though, the name of staff conducting the search is not consistently recorded, and the number of staff/civilians searched is not tracked at all. A combination of watch commanders, facility operations staff, and compliance staff review the data, primarily to verify search compliance. The frequency of search audits varies, and it is unclear whether the auditors verify that searches occur as documented.

**Recommendations.** The Office of Inspector General recommends that the Sheriff's Department standardize search procedures across all facilities with a focus on qualitative consistent data collection, clarifying property handling instructions, enforcing clear bag rules, and strengthening data review and audits. Adopting these measures will improve staff/civilian accountability and assist in determining whether searches are both conducted as required and effective at deterring or intercepting contraband.

As previously reported, the comprehensiveness of the searches varies across facilities as does the minimum requirement per week. The table below details the staff search practices at all jail facilities from April 1 to June 30, 2025. The data regarding the

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<sup>&</sup>lt;sup>78</sup> TTCF, IRC and NCCF also involve supervising line deputies and watch deputies in property searches.

<sup>&</sup>lt;sup>79</sup> See Los Angeles County Sheriff's Department, Custody Division Manual, § 3-01/090.15 Personal Bags.

number of staff searches and searches with K-9 illustrated in the table was supplied by CSSB. CSSB extracted the data on searches from the CWCL on July 3, 2025. K-9 data was obtained from the Custody Investigative Services (CIS) Searches of Custody Personnel Report on July 3, 2025. The Office of Inspector General was unable to verify the data provided by CSSB without additional information.

Facility	Number of Staff Searches	Number of Staff Searches with K-9	Monthly Minimum Search Requirement <sup>80</sup>	Search Inside Security	Search Evasion Concerns	Where Searches Logged
						111
MCJ	123	10	Unable to Determine <sup>81</sup>	No	Yes	Watch Commander Log; Searches of Custody Personnel Report
TTCF	80	3	Yes <sup>82</sup>	Yes	Yes	Watch Commander Log; Searches of Custody Personnel Report
IRC	28	2	Unable to Determine <sup>83</sup>	No	Yes	Watch Commander Log; Searches of Custody Personnel Report
CRDF	28	6	No <sup>84</sup>	No	Yes	Watch Commander Log; Searches of Custody Personnel Report

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<sup>80</sup> Each jail facility's unit order regarding staff searches was used to determine whether it met its minimum search requirement by month. Where the unit order is silent regarding the minimum search requirement, the Office of Inspector General was unable to determine if the requirement was met. Also, the jail facility must meet the minimum search requirement during each of the three months in the quarter in order to be found in compliance.
81 Los Angeles County Sheriff's Department, Custody Division Unit Orders, § 3-08-021 Security of Personal Property does not describe a minimum number of searches per week, which makes it difficult to determine whether they met this requirement.

<sup>&</sup>lt;sup>82</sup> Los Angeles County Sheriff's Department, Custody Division Unit Order, § 3-08-010 Security of Personal Property. ("Watch commander shall ensure a minimum of two random searches are conducted each week of persons entering the secured area during their assigned shift").

<sup>&</sup>lt;sup>83</sup> Los Angeles County Sheriff's Department, Custody Division Unit Order, § 5-23/006.00 Security and Searches of <u>Person Property</u> does not describe a minimum number of searches per week, which makes it difficult to determine whether they met this requirement.

<sup>&</sup>lt;sup>84</sup> CRDF did not meet its minimum search requirement in April and May 2025. Los Angeles County Sheriff's Department, Custody Division Unit Order, § 3-01-090 Searches of Sworn Personnel, Custody Assistants, Professional Staff and their personal property-Approved by CSS 3/11/2024 ("The searches shall be conducted a minimum of once per week, per shift." [unit order obtained via email message]).

NCCF	158	3	No <sup>85</sup>	Yes	Yes	Watch Commander Log; Searches of Custody Personnel Report
PDC-North	34	2	Unable to Determine <sup>86</sup>	Yes	Yes	Watch Commander Log; Searches of Custody Personnel Report
PDC-South	42	3	Yes <sup>87</sup>	Yes	Yes	Watch Commander Log; Searches of Custody Personnel Report

### **Office of Inspector General Site Visits**

The Office of Inspector General regularly conducts site visits and inspections at Sheriff's Department custodial facilities. In the second quarter of 2025, Office of Inspector General personnel completed 88 site visits, totaling 362 monitoring hours, at IRC, TTCF, CRDF, MCJ, Pitchess Detention Center North, PDC South, and NCCF.

As part of the Office of Inspector General's jail monitoring, Office of Inspector General staff attended 119 Custody Services Division (CSD) executive and administrative meetings and met with division executives for 146 monitoring hours related to uses of force, in-custody deaths, Prison Rape Elimination Act (PREA) compliance, restrictive housing, and general conditions of confinement.

# **Use-of-Force Incidents in Custody**

The Office of Inspector General monitors the Sheriff's Department's use-of-force incidents, institutional violence, and assaults on Sheriff's Department or CHS personnel by people in custody.<sup>88</sup> The Sheriff's Department most recent force report is for use-of force-incidents in custody through the first quarter of this year. This report and reports

<sup>&</sup>lt;sup>85</sup> NCCF did not meet its minimum search requirement in June 2025. Los Angeles County Sheriff's Department, Custody Division Unit Order, § 07-145/10 Personal Property Searches. ("A minimum of four (4) random searches per shift per week of any personnel and/or official visitors shall be conducted at the discretion of the watch sergeant.").

<sup>&</sup>lt;sup>86</sup> Los Angeles County Sheriff's Department, Custody Division Unit Order, § 3-06-010 Security of Personal Property does not describe a minimum number of searches per week, which makes it difficult to determine whether they met this requirement.

<sup>&</sup>lt;sup>87</sup> Los Angeles County Sheriff's Department, Custody Division Unit Order, § 3-02-080 Searches of Sworn Personnel, Custody Assistants, Professional Staff and Their Property on the Facility. ("The searches shall be conducted at a minimum of once per week, per shift.")

<sup>&</sup>lt;sup>88</sup> Institutional violence is defined as assaultive conduct by a person in custody upon another person in custody.

for prior quarters may be found on the Sheriff's Department website's transparency section under the <u>page for use of force</u>.

### **Handling of Grievances and Comments**

# Office of Inspector General Handling of Comments Regarding Department Operations and Jails

The Office of Inspector General received 329 new complaints in the second quarter of 2025 from members of the public, people in custody, family members and friends of people in custody, community organizations and County agencies. Each complaint was reviewed by Office of Inspector General staff.

Of the complaints received, 298 were related to conditions of confinement within the Department's custody facilities, as shown in the chart below:

Grievances/Incident Classification	Totals
Medical	108
Personnel Issues	31
Living Condition	31
Food	16
Classification	14
Mail	13
Bedding	12
No Response to Grievance	12
Showers	11
Education	10
Commissary	7
Transportation	6
Dental	6
Mental Health	5
Telephones	4
Release Date issue	3
Visiting	2
Other	7

Thirty-one complaints were related to civilian contacts with Department personnel by persons who were not in custody, as shown in the chart on the following page:

Complaint/Incident Classification	Totals
Personnel	
Improper Tactics	9
Discourtesy	3
Alleged Criminal Conduct	2
Dishonesty	2
Harassment	2
Improper Detention, Search,	
Arrest	2
Force	1
Off Duty Conduct	1
Other	1
Service	
Policy Procedures	3

### Handling of Grievances Filed by People in Custody

The Sheriff's Department has not fully implemented the use of computer tablets in its jail facilities to capture information related to requests, and eventually grievances, filed by people in custody. There are currently 74 iPads installed in jail facilities: 38 at TTCF; 12 at MCJ; and 24 at CRDF. During the second quarter there were no new installations and two iPad replacements. The Department assures that the iPads that have been removed from circulation will eventually be redeployed. There were 198,127 automated responses provided to people in custody using the iPad application to request information.

The Sheriff's Department continues to experience technical issues with iPads primarily due to unreliable power sources. The Department reports that currently the iPads are powered through facility televisions, which are switched off every evening. As a result, the iPads lose power overnight, thereby requiring those iPads to recharge each morning. Each day, the iPads require manual connection to Wi-Fi once recharged. Facility Services Bureau (FSB) personnel have been working to install dedicated power and data lines for the iPads. The Department reports that walkthroughs have been completed at both TTCF and MCJ, with a quote received for TTCF, and a quote pending for MCJ.

The Department states that TTCF remains the most stable facility in terms of connectivity, and for this reason that facility has been prioritized. The Department noted that once the FSB project at TTCF is complete reconfiguration and programming of the iPads will resume.

As <u>previously reported</u>, the Sheriff's Department implemented a policy in December 2017 restricting the filing of duplicate and excessive grievances by people in custody.<sup>89</sup> The Sheriff's Department reports that between April 1 and June 30, 2025, no one in custody had been placed on restrictive filing and therefore did not reject any grievances under this policy.

The Office of Inspector General continues to raise concerns about the quality of grievance investigations and responses, which likely increases duplication and may prevent individuals from receiving adequate care while in Sheriff's Department custody.

### **Sheriff's Department's Service Comment Reports**

Under its policies, the Sheriff's Department accepts and reviews comments from members of the public about departmental service or employee performance.<sup>90</sup> The Sheriff's Department categorizes these comments into three categories:

- External Commendation: an external communication of appreciation for and/or approval of service provided by the Sheriff's Department members;
- Service Complaint: an external communication of dissatisfaction with the Sheriff's Department service, procedure, or practice, not involving employee misconduct; and
- Personnel Complaint: an external allegation of misconduct, either a violation of law or Sheriff's Department policy, against any member of the Sheriff's Department.<sup>91</sup>

The Sheriff's Department now has a <u>complaints dashboard</u> that can be sorted by date range with options to narrow the results by practice area (such as Patrol or Custody), rank, or station or unit.

## **Sheriff's Department's Response**

The Sheriff's Department was provided with a draft of this report, and the following is the Department's response.

<sup>&</sup>lt;sup>89</sup> See Los Angeles County Sheriff's Department, Custody Division Manual, § 8-04/050.00, <u>Duplicate or Excessive</u> <u>Filings of Grievances and Appeals, and Restrictions of Filing Privileges</u>.

<sup>&</sup>lt;sup>90</sup> See Los Angeles County Sheriff's Department, Manual of Policy and Procedures, § 3-04/010.00, Department Service Reviews.

<sup>&</sup>lt;sup>91</sup> It is possible for an employee to get a Service Complaint and Personnel Complaint based on the same incident.

#### **RESPONSE TO**

# Reform and Oversight Efforts: Los Angeles County Sheriff's Department April through June 2025

### From page 6

#### Internal Affairs Bureau

Correction on number of cases:

"During this quarter, the Sheriff's Department reported opening **130** new administrative investigations. Of these **130** cases, 50 were assigned to IAB, 41 were designated as unit-level investigations, and 39 were entered as criminal monitors (in which IAB monitors an ongoing criminal investigation conducted by the Sheriff's Department or another agency)."

### From page 7

### Status of Taser Policy Implementation and Training

Based on additional information from the Body Worn Camera Unit regarding CEW procurement and tracking, the earlier statement provided requires clarification.

Because the number of patrol deputies changes over time, there may be more Taser 10 units than deputies who still require training.

This can be clarified by stating, "There are 511 Taser 10 devices currently available for assignment to deputies upon completion of training; however, because the number of patrol deputies changes over time, the ratio of devices to untrained deputies cannot be precisely determined. In addition, further procurement of devices and training of personnel will be required to complete Phases II and III."

The following information provides further context regarding the number of Taser 10 units still needed within the Department:

The Department procured 3,197 Taser 10 units as part of Phase I of a three-phase implementation plan. Phase I focused on equipping a large percentage of patrol personnel. The Department intends to expand deployment in:

- Phase II: Specialized Units and the Detective Division
- Phase III: Custody Division

To date, Phase I has been funded through internal Department resources. However, sustainable funding has not yet been allocated for the full implementation of the Taser

10 Project. The Department has formally requested that ongoing funding be incorporated into the Department's budget to support continued deployment and training.

The following additional information demonstrates the significant operational impact of the Taser 10 in field operations:

- 5 deputy-involved shooting mitigations
- 5 successful interventions in self-harm incidents
- An approximate 87% effectiveness rate
- In 15% of deployments, the involved party was armed with a weapon

These outcomes underscore the Taser 10's value as a critical public safety tool. Its enhanced capabilities over legacy models include:

- A warning alert feature that supports de-escalation
- A maximum range of 45 feet, nearly 20 feet farther than previous models
- The ability to accurately deploy up to 10 cartridges, increasing the likelihood of achieving neuromuscular incapacitation (NMI) and gaining safe control of the involved individual

Most of the Department's older taser models are no longer under warranty and do not provide the same capabilities as the Taser 10. The Taser 10's advanced features have already saved lives, and with sustainable funding, they will continue to enhance public safety. The Department strongly urges that funding for the Taser 10 Project be made a priority to ensure its continued success in protecting our communities.

### From page 8

Regarding CEW information from the Custody Division, Custody Operations Directive 22-005, *Updated Procedures for the Use of the Conducted Energy Weapon (CEW)*, is the operative policy, superseding the relevant section of the CDM. The Directive specifically addresses the matter of personally owned CEWs as follows:

### PERSONALLY OWNED CEW

Department personnel who purchase a CEW shall only carry Departmentauthorized CEWs whether on or off-duty. Department personnel shall only use personally owned CEWs in accordance with this COD.

Personnel may carry personally owned CEWs after approval of their unit commander and after inspection by CTSB.

Personally owned CEWs shall be numerically identifiable and available for computer download upon the request of a supervisor or during regular download intervals as defined in CDM section 7-08/030.05, "TASER Download Procedures."

Department personnel shall record all personally owned Department-authorized CEWs (carried on-duty and off-duty) with the Personnel Administration Bureau when the devices are purchased, obtained, sold, disposed of, lost, or stolen.

Attached is the Directive for reference.

### **Bottom Page 8:**

Highlight the title "Semi-Annual Report on Implementation of the Family Assistance Program"

### Page 12

# Improving the Treatment of Family Members of Individuals Killed or Seriously Injured by Sheriff's Deputies

Adopting as policy the requirements of the proposed legislation will likely result in more trauma-informed treatment of family members. The Office of Inspector General recommends that the Sheriff's Department implement a policy that provides the safeguards proposed by AB 3021.

The Department will evaluate this recommendation, along with any reason why AB 3021 was not passed.

### From page 13

### Sheriff's Department's Cooperation with Federal Immigration Authorities

While the Sheriff's Department has policies that limit cooperation with federal authorities on immigration enforcement, data collected by the Sheriff's Department is sometimes unintentionally transferred to the federal government and such data may have the effect of assisting immigration authorities without the intent to do so. As discussed in a previous report, Live Scan data that includes a person's country of birth and other identifying information is collected by the Sheriff's Department at booking and then shared with the federal government by CA-DOJ, which requires the information.

It is important to note the Sheriff's Department complies with SB 34 and does not provide ALPR or other protected data to federal immigration authorities. Any transfer of booking data to federal agencies occurs only through the California Department of Justice as required by law and is entirely outside the Department's control. This added

context is important to include to ensure a better understanding of the issues, and we respectfully request it be included.

### From page 22

### Storing of Sensitive Data

While there may be validity to this argument, there must be a careful balance between public safety and privacy. Given the sheer number of images the system collects, most of which pertains to individuals not involved in any criminal activity, it is worth questioning whether the prolonged retention is justified.

ALPR does not store personal identifying information, making the reference to "individuals" inaccurate. The system records license plate data, and any link to a person requires a separate, legally authorized process. Suggesting that most records "pertain to individuals" may misrepresent the nature of the data and the system's function. This added context is important to include to ensure a better understanding of the issues, and we respectfully request it be included.

### From page 24

#### Recommendations

- 1. The Sheriff's Department should revise its ALPR policies to include either a specific prohibition from sharing ALPR data with federal and out-of-state agencies or include that the data may only be shared with a public agency as defined in Civil Code section 1798.90.5(f).
- 2. The Sheriff's Department should revisit its policy of retaining ALPR images for five years after conducting a study on the benefit of a lengthy retention period as and the privacy issues created by the longer retention rate.
- 3. The Sheriff's Department should continue to conduct periodic audits to ensure that personnel are using the ALPR systems for authorized purposes. Audits should include a review of a sample of individual queries, requiring the auditors to assess whether the query was necessary for the investigation or case cited by the employee.
- 4. The Sheriff's Department should implement sunset clauses in its agreements with partnering agencies that receive ALPR data. Theses clauses would ensure that data-sharing agreements are subject to periodic review and renewal, rather

than remaining in place indefinitely or for extended periods of time. At the time of renewal, the Sheriff's Department should thoroughly review the terms to confirm they still are aligned with current laws, policies, and best practices. Part of this review would require verification that the partnering agency has not been flagged by the Attorney General's Office for non-compliance with SB 34.

### Response to OIG Recommendations on ALPR Policies

The Department will review these recommendations further to ensure continued compliance with all applicable laws, including SB 34 and SB 54, while balancing privacy concerns with legitimate law enforcement needs, including: (1) reviewing Civil Code section 1798.90.5(f) to consider incorporating it more fully into the ALPR privacy policy; (2) conducting a study to determine the feasibility of reducing the current five-year retention period (although the Department has concerns regarding shortening the retention period due to ongoing investigative needs and the evidentiary value that ALPR data provides); (3) continuing to conduct audits to confirm that ALPR usage complies with Department policies and applicable laws (it should be noted that in March 2025, an audit of 5,206 records, representing individual gueries by staff, revealed zero violations), and reviewing whether expanding the scope of audits to include an assessment of the necessity of each query for the associated investigation or case is feasible; and (4) evaluating sunset clauses, although it should be noted that while the Department's ALPR Inter-Agency Agreement does not include a sunset clause, Section IX provides that either party may terminate the agreement with ten days' written notice (it is further important to note that these agreements are standard among agencies, and the Department cannot unilaterally change all of the agreements). Nevertheless, the Department will consider this proposed language once additional information is gathered to ensure it could be implemented effectively.

### From page 24

## Outstanding Requests to the Sheriff's Department

The Department responded to the October 2024 subpoena by providing over 55 gigabytes of data, contained on four thumb drives, consisting of documents, emails, phone logs, and other relevant material responsive to the subpoena. Due to the April 2025 request for additional materials, the Department requested that County Counsel retain outside counsel to conduct a thorough and independent review of the materials produced and assist the Department in locating any additional materials responsive to the document request. The request to hire counsel was made soon after the April 2025 OIG request, and counsel was ultimately retained in July 2025 and has begun working on this matter.

### From page 33

### Revenue Sharing and the Inmate Welfare Fund Section

"Funding for jail maintenance, programming, and for the welfare of persons in custody should be part of the Sheriff's Department budget allocated from County resources."

The Inmate Welfare Fund (IWF) stopped paying for any FSB projects on February 28, 2025. No new projects initiated by FSB in fiscal year 2024/2025 were charged to the IWF. The February 2025 date was to cover FSB projects approved prior to FY2024/2025.

### From page 36

Compliance with the Settlement Agreement in Johnson v. Los Angeles Sheriff's Department for People in Custody with Mobility Impairments

"The Office of Inspector General stressed the need for the Sheriff's Department, in collaboration with Correction Health Services ("CHS"), to conduct a comprehensive assessment of its class member population to ensure that it houses all class members in appropriate areas of the jails and provides all necessary accommodation in accordance with the terms of the agreement."

The Department agreed with the recommendation and completed a "questionnaire" with the class members to gain compliance with the recommendation. However, CHS has not agreed to the recommendation and as a result an assessment has not been conducted. The report should reflect our efforts.

Additionally, this quote is in reference to the comprehensive assessment OIG has repeatedly requested for several years. CHS indicated it does not have the funding, nor the personnel, to accomplish a comprehensive assessment of each class member in the custody environment. However, the ACB ADA team and the CCSB Johnson Team reached out to members of CHS to develop a system to comply with OIG's request for a comprehensive assessment. In June 2025, the ACB ADA team and the CCSB Johnson Team contacted each class member that was housed outside of ADA housing and asked them a pre-designated series of questions pertaining to their mobility needs and services they were entitled to under ADA (i.e., cane/wheelchair, thermal clothing, proper wristband classification, foam "egg crate" mattresses, etc.). Where applicable, any service needs were fulfilled and addressed and/or routed to the unit for handling. Although CHS was not a part of this assessment, any Johnson class

members who requested a meeting with a medical professional were provided a Health Service Request form and the forms were submitted to CHS.

### From page 36

"For example, many of these housing areas lack access features such as grab bars and benches in the showers, making it difficult for mobility impaired class members to steady themselves while showering. Some class members reported difficulties with entering and exiting the shower areas due to the presence of a raised threshold at the bottom of the entrance designed to keep water in the shower basin."

A recent memorandum was forwarded to Division Director Conrad Meredith who oversees the Facilities Planning Bureau (FPB), requesting a spatial evaluation and analysis of potentially modifying the group showers at MCJ 2000 and 3000 Floors to be aligned with ADA requirements for shower accessibility. The request is part of a potential capital asset project, with FPB providing the initial evaluation and cost analysis prior to a budget request from the BOS.

Additionally, ACB worked closely with MCJ and Facilities Services Bureau (FSB) to identify the other impactful locations at MCJ to make modifications to the showers and bathrooms. The 5000 Floor dormitory showers were identified as the most ideal locations due to the high number of class member inmates and the ability for FSB to modify the showers in a cost-effective, less labor-intensive manner. Recent phasing plans to begin re-housing 5000 Floor inmates by dormitory were forestalled by an emergency work order from PDC North Facility. The subsequent delay will be approximately 15 weeks.

### From page 36 (bottom) and 37 (top)

"Office of Inspector General staff spoke with 27 class members who reported not having received their prescribed device and confirmed that 11 had active medical orders for the device they reported not having at the time they spoke with Office of Inspector General staff. Several class members we spoke with had a mobility assistive device but were not assigned the corresponding classification code. In speaking with medical and custody staff regarding this concern, the Office of Inspector General learned that prescriptions for mobility assistive devices are not actively monitored, resulting in delays in the removal of devices once prescriptions expire and secondary review options are exhausted."

The dispensation of medical devices is handled by CHS, as well as the prescription order monitoring process. As it relates to classification code assignment, during the comprehensive assessment conducted by the ACB ADA Team and CCSB Johnson Team in June 2025, any class member identified as missing the appropriate subclassification on their wristband was immediately issued a new wristband once their medical device order was confirmed.

### From page 37

"Third, although the Sheriff's Department has made progress towards compliance with two provisions on the processing of ADA-related grievances, it failed to meet the compliance standards required to achieve substantial compliance. This was, in large part, due to (1) CHS' failure to designate ADA-related grievances correctly, hampering any progress achieved by the Sheriff's Department, (2) methodological issues that impacted the accuracy of the Sheriff's Department's self-assessments that are used by the Office of Inspector General to make compliance determinations, and (3) not fully addressing all components of a grievance to ensure that it is adequately responded to."

Related to (1): This is a CHS data entry issue; however, the CHS, ACB and CCSB Johnson Teams met with CSS and CITU to include into CIGA the specific grievance designation OIG requested.

Related to (2): The OIG audited data received by CSS and discovered some of the grievances were not included in the auto-generated report, because they were submitted by sub-units, who were not included in the parameters of the auto-generated report. CCSB subsequently replicated the methodology used by the OIG to ensure the entire universe is captured and the CCSB team is examining every grievance individually to ensure all are reviewed properly.

Related to (3): CCSB worked with CSS to address data entry issues with third party grievances, because multiple issues were reported on one grievance form and it was difficult to track which issue was addressed and which issues potentially remained unresolved. CCSB requested that CSS require all third-party grievances submitted by the ACLU and OIG contain one complaint per grievance form. Although the method increased the overall number of grievances, the responses more accurately reflected each issue complained about and how each issue was resolved.

## From page 42

Tracking Narcotics Intervention Efforts

With regard to the directive to the Sheriff's Department to track narcotics recovery and evaluate drug detection interventions, as previously reported the Sheriff's Department does not presently track narcotics detection in a format that allows data to be readily analyzed and reports that it does not have the capacity to build a mechanism to track narcotics seizure by drug detection mechanism, nor is it able to compile extractable data collected in the Los Angeles Regional Crime Information System (LARCIS) to evaluate the efficacy of drug detection intervention. Instead, the Sheriff's Department takes the position that constructing an all-encompassing jail management data system would best support the Sheriff's Department's efforts to track narcotics recovery and evaluate the efficacy of drug detection interventions. The Office of Inspector General continues to recommend that the Sheriff's Department examine ways to comply with the Board's directive by standardizing search procedures division-wide, improving reporting requirements for staff, and compiling data on detection interventions and seizures using existing technologies.

The Department recognizes the importance of accurately tracking narcotics recoveries and evaluating the effectiveness of drug detection interventions. In response to the Board's directive and the Office of Inspector General's recommendations, the Department is in the initial stages of developing an in-house centralized database system where all narcotics recoveries, along with additional relevant recovery criteria, can be entered and maintained. This will serve as an interim solution, while Custody Division awaits the procurement and implementation of its modern Jail Management System.

This system will serve as a single, streamlined platform for querying data and compiling information, thereby enhancing the Department's ability to analyze trends, assess the efficacy of detection interventions, and produce reports in a more efficient and user-friendly manner. While development of this system will require time and resources, it represents a proactive step toward improving data collection and compliance with oversight expectations using a sustainable and scalable solution.

### From pages 42 and 43

**Search practices.** All seven facilities conduct searches of staff and civilians; however, as previously reported, the frequency of searches and search procedures vary by facility. Searches of Sheriff's Department and CHS staff are typically conducted by supervisory personnel, namely sergeants, at shift change near the main control entry. While K-9s may be present during searches, they do not search staff, civilians, or their property bags as they enter the facility. Targeted searches based on credible and actionable intelligence are overseen by the Internal Criminal

When K-9 units are requested and deployed to assist with staff searches, their key role is to search property rather than individuals.

### From pages 47 and 48

### Handling of Grievances Filed by People in Custody

The OIG's reported concerns related to grievances generally, rather than ADA-related grievances specifically. As mentioned in the OIG Report, the Department intends to redeploy the iPads. The use of such will be utilized for inmate requests for information, as well as grievances. The OIG Report did not cite specific investigations to demonstrate the OIG's issue with the quality of grievance investigations. The quality of grievances investigations is currently measured against objective criteria and reviewed by Department supervisors. The implementation of the CIGA system has improved timeliness concerns. CSS may also be able to provide an additional response.