

Antelope Valley Monitoring Team 18th Semi-Annual Report



June 2024

CONTENTS

I.	Introduction.....	1
II.	Work to Date.....	3
	A. Monitoring Activities in This Reporting Period.....	3
	B. Stops, Seizures, and Searches.....	6
	C. Bias-Free Policing.....	27
	D. Enforcement of Section 8 Compliance.....	35
	E. Data Collection and Analysis.....	37
	F. Community Engagement.....	41
	G. Use of Force.....	57
	H. Personnel Complaint Review.....	69
	I. Accountability.....	77
III.	Conclusion.....	84
	Appendix A: Monitoring Team and Website.....	A1
	Appendix B: Settlement Agreement Compliance.....	B1

TABLES

Table 1: Stops, Seizures, and Searches Compliance Status
Table 2: Bias-Free Policing Compliance Status
Table 3: Enforcement of Section 8 Compliance Status Table
Table 4: Data Collection and Analysis Compliance Status
Table 5: Community Engagement Compliance Status
Table 6: Use-of-Force Compliance Status
Table 7: Personnel Complaint Review Compliance Status
Table 8: Accountability Compliance Status

I. INTRODUCTION

This is the 18th semi-annual report issued by the Antelope Valley Monitors. It describes the observations of the Monitoring Team (MT) on progress made by Los Angeles County and the Los Angeles County Sheriff's Department (LASD or the Department) in meeting the requirements of their Settlement Agreement (SA) with the US Department of Justice (DOJ) for the Antelope Valley (AV).¹ This report focuses on work conducted between January and June 2024.

During this reporting period, LASD continued to build on the gains made over the last year and has achieved critical milestones. Chief among these, after nine years of monitoring, LASD has a use of force (UOF) policy compliant with the SA. This is a significant accomplishment and is the result of a great deal of hard work. The Monitors appreciate that Sheriff Robert Luna, the Office of Constitutional Policing (OCP), and the Association of Los Angeles Sheriff Deputies (ALADS) prioritized this work over the last two reporting periods. With this process complete, the Department will now move to the next stage of policy implementation, including updating use-of-force training to address changes in policy. This is a departmentwide policy and, as such, will require that every member of sworn staff receive the new training.

LASD also focused on revising another UOF-related policy, the conducted energy weapon (CEW, aka Taser) policy. This policy has been deemed in compliance on the condition that the policy be revised if it is found that certain uses of the device are problematic.² LASD has also procured an updated Taser model and will distribute this new equipment to the AV personnel in the upcoming reporting period. At the time this report was being drafted, LASD had submitted a training curriculum for the new Taser, which is now being reviewed by the MT and DOJ.

Even as it continues to revise and improve its training programs in multiple areas, LASD has achieved compliance on the roll call trainings related to constitutional policing, bias-free policing, and housing (SA Paragraph 71), and it has progressed from "compliance" to "sustained compliance" on constitutional and bias-free policing training (SA Paragraphs 57 and 70). It has also improved their compliance status on important community engagement provisions, such as reaching compliance for being open and available for community feedback (SA Paragraph 87b) and sustained compliance on its annual community engagement reports (SA Paragraph 91).

Across many of the SA sections, LASD continued to lay critical groundwork. The Department has developed and piloted two impressive data dashboards whereby department managers can access and analyze data, one for tracking deputy enforcement activities and the other an early intervention system for risk management issues like complaints and uses of force. The Department has also recognized and is working to eliminate issues with the timeliness and reliability of available data. These efforts to

¹ Settlement Agreement, No. CV 15-03174, *United States v. Los Angeles County et al.* (D.C. Cal. Apr. 28, 2015).

² The CEW policy has been approved under the condition that AV station managers closely attend to any CEW incidents involving more than three cycles or more than 15 seconds of CEW application.

increase the capacity of the Department to regularly use data to inform practice led to a change in status from non-compliance to partial compliance for provisions related to the analysis of stops data (SA Paragraphs 82 and 84) and use-of-force data (SA Paragraph 121). The Department continues to make progress revamping the Performance Mentoring Program (PMP), including drafting a new PMP guidebook and developing an application to better manage and track the program. Meanwhile, AV stations have instituted changes designed to ensure that deputies needing additional guidance receive fair and effective mentoring.

Sheriff Luna's administration is bringing an increased level of coordination and professionalism to the Department. The MT has long been concerned that LASD had become an overly insular agency with few external professionals brought in as consultants or trainers and fewer still LASD employees participating in non-LASD trainings, attending conferences, and collaborating with other departments to gain exposure to best practices and new approaches that are evolving in the field of policing. That is now changing under this administration. For example, LASD has brought in national expertise from the Collaborative Reform Initiative Technical Assistance Center (CRI-TAC) to review training related to UOF and improving community engagement practices. Also, LASD sent Audit and Accountability Bureau (AAB) auditors to a well-regarded auditing school with a special focus on law enforcement. Such exposure not only facilitates the work of the SA but hastens the Department's adoption of national best practices and 21st-century policing.

The Department continues to approach tasks with an increased sense of urgency instilled by the new administration since it came into office. The time it takes the Department to respond to MT and DOJ input has decreased. The Department ensures the right staff—content experts and those with the authority to make quick decisions—are at the table in working meetings. LASD reaches out frequently to the MT for technical assistance as they develop and revise policies, trainings, audit plans, and other important documents and processes. Recognizing the value of the SA mandates, as well as the pitfalls and challenges faced in having two stations conduct law enforcement activities under rules and procedures that vary in some ways from the rest of the sprawling agency, the Department has made an effort to implement SA-related changes across the agency rather than just in the AV.

Perhaps the most significant shift noted in this reporting period is in the disposition of station leadership and executive leadership toward feedback and even criticism. The station captains demonstrate a genuine interest in community engagement and have improved efforts to build trust with the community. They respond to questions and criticism from the community without defensiveness, have diversified the Community Advisory Councils (CACs), and are implementing new strategies to track both community concerns over time and station efforts to address those concerns. Additionally, LASD has brought in outside experts, including the Center for Policing Equity and the US Department of Justice Community Relations Services to help the Department improve stations' community engagement and relations strategies. The Department also implemented a publicly available online stops data "dashboard" to increase transparency regarding station activities.

The Monitors appreciate the hard work being put into the SA reforms by the Office of Constitutional Policing and its director, Eileen Decker; the Compliance Unit; the station captains and their compliance teams; and the ongoing attention and engagement shown by the new chief of North Patrol Division

(NPD), Allen Castellano. We acknowledge the leadership of Sheriff Luna, Undersheriff April Tardy, and Assistant Sheriff Myron Johnson, all of whom are clearly prioritizing the SA-required reform efforts and who routinely make themselves available to the MT.

We want to acknowledge the frontline deputies and sergeants who are being asked to do their already difficult jobs in new ways, translating new policies and training through their interactions with the public, often with more oversight and scrutiny being brought to bear. Since stops and calls for service represent by far the most common form of community engagement the Department conducts, the daily work of deputies and sergeants is the primary community trust-building activity and the critical juncture for constitutional policing. While it is not often directly referenced, the safety and health of line deputies is a subtext throughout the SA: clearer rules for conducting business via stronger policies, more effective training, supportive guidance and mentoring from superiors, and greater understanding and trust among community members all correlate with deputies pursuing healthy and satisfying law enforcement careers. The Monitors have seen evidence of increased support among sergeants and deputies for the SA and other reforms being put in place by this administration. We are confident that progress will continue.

In closing, it goes without saying that the ultimate objective of the Settlement Agreement is to ensure the community is being provided with law enforcement services that comply with the Constitution and all applicable legal requirements, ensure improved public safety as well as that of the deputies, and enhance the community's trust and confidence in LASD. While we have seen positive signs that the stations' leadership is promoting new engagement strategies, as well as open attitudes toward the community, it is critical that this important shift continues to be nourished and reinforced by executive leadership. Of course, the community plays an essential role in this process—and are often not given sufficient credit—in ensuring these objectives are being met. They do so through their ongoing engagement with LASD and the feedback they provide to help inform the policies and tactics that ultimately influence public perceptions. We would be remiss if we failed to acknowledge the commitment and excellent work being done by the CAC members and other community stakeholders who have been instrumental in carrying out this critical role and who have devoted considerable time and energy to furthering the objectives of the SA.

In this report to the AV community, LASD personnel, and the court, we are pleased to provide details on how these efforts and leadership have translated into progress toward SA compliance.

II. WORK TO DATE

A. Monitoring Activities in This Reporting Period

To further our responsibilities regarding SA compliance assessment and providing technical assistance, the Monitoring Team continued to conduct various work activities in this reporting period. We participated in regular meetings with the Parties (LA County, LASD, and DOJ), the Community Advisory Committees (CACs), and community members; conducted site visits; engaged in ongoing telephone and electronic communications with Compliance Unit, AV station and NPD leadership, various LASD

bureaus, OCP, DOJ, and community members; and provided feedback on our observations of management performance based on station visits and meetings held to review critical incidents and risk management issues.³ Examples of the specific activities undertaken for various sections of the SA are discussed in more detail below.

General

Attended site visit meetings at the Hall of Justice and at the AV stations, met with Sheriff Luna and the Director of the Department's Office of Constitutional Policing, participated in numerous smaller in-person meetings and regular virtual meetings, shared daily electronic correspondence.

Stops and Bias-Free Policing

- Met with the LASD Audit and Accountability Bureau (AAB) several times and reviewed and provided multiple rounds of feedback on AAB stops audits.
- Reviewed LASD's verifications of attendance at roll call trainings and full-day training sessions.
- Regularly met with LASD staff to provide feedback and technical assistance (TA) on the development of their new online stops and risk management dashboards.
- Evaluated training documents and provided feedback to LASD.
- Created a process for the parties to track the development and approval of training being offered for SA compliance.
- Provided TA to LASD regarding crime prevention strategies.
- Reviewed and discussed revisions to the body-worn camera (BWC) policy (also related to UOF and Complaints sections).

Community Engagement

- Maintained consistent contact with CAC members and other community members.
- Reviewed stations community engagement efforts and the stations' annual Community Engagement reports for compliance with the SA.
- Observed presentations by the OCP on community engagement activities and plans.
- Published the community survey data and report.⁴
- Attended CAC, town hall, and other community meetings.

³ See the Monitors' previous semi-annual reports and, in particular, the [15 Semi-Annual Report, Appendix D Only.pdf](#), under Documents and Reports at our website, <http://www.antelopevalleysettlementmonitoring.info/> for more detailed information about the work history for each SA paragraph.

⁴ See links to the four Community Survey reports at <http://www.antelopevalleysettlementmonitoring.info/> under Community Surveys.

- Met with LASD leadership regarding the CACs and community engagement activities.
- Attended and provided feedback to the Department on the Crime Management Forum (CMF).
- Attended and provided feedback to the Department on the Risk Management Forum (RMF).
- Reviewed documentation, observed presentation, and provided feedback on LASD's plan to revamp the CMF and RMF.

Use of Force

- Met with and collaborated with AAB staff in the development of a series of "mini" use-of-force audits.
- Requested and reviewed the Department's response to the MT AV use-of-force audit.
- Continued assessment of the Department's updated use-of-force and CEW/Taser policies, including providing feedback, participating in several meetings with Parties, and, ultimately, determining the policies were in compliance.
- Met with the four newly appointed AV captains and discussed SA-related issues associated with the use, investigation, and adjudication of force.
- Continued to monitor and provide feedback on Executive Force Review Committee (EFRC) and Critical Incident Review Panel (CIRP) cases heard during the first half of 2024.
- Provided recommendations and feedback on the Department's policy for the examination of firearms involved in an unintentional discharge.

Complaints

- Met and worked with AAB and the CU on numerous occasions to develop work plans for the Department's audit of the personnel complaint processes.
- Worked with AAB to revise its audit strategy to focus on smaller audits, providing field captains with more timely feedback. Also reviewed AAB audit work plans and reports.
- Monitored LASD's processing of several community complaints, which were brought to our attention by community members.
- Reviewed the adjudication of a complaint that we had been monitoring and returned it to North Patrol Division with more questions.

Accountability

- Reviewed quarterly reports and provided feedback on managers' use of those reports to identify and address trends both for individual deputies and work groups.
- Identified issues with the screening process for awarding coveted positions, especially field training officer and detective, and made recommendations for improvement.
- Continued to work with the OCP and the commanders who form the PMP Panel on revising the PMP program.

- Provided input to the Department on a policy it is developing to document the returning of deputies to field duty after their involvement in a critical incident.

B. Stops, Seizures, and Searches

The Department's efforts in this reporting period regarding stops-related SA provisions focused on the following activities.

- Continue providing full-day constitutional policing training.
- Continue providing roll call training.
- Review and revise training for LASD-AV deputies on SA-related topics.
- Continue efforts to procure a modern data management system, developing an early intervention system, and advancing the ways and extent to which data are used to inform practice at the AV stations.
- Continue working with the Center for Policing Equity on the stops and disparity analysis and community engagement activities.
- Conducted AAB stops audits.
- Develop crime prevention strategies.
- Improve upon the application of the SARA (scanning, analysis, response, and assessment) problem-solving model by the AV stations and in the CMF.

1. Training

a. *Constitutional Policing Training*

- The Department is in sustained compliance with the delivery of the approved full-day constitutional policing training (SA Paragraph 57).

LASD continued to provide the full-day constitutional policing training during this period for LASD-AV deputies and embedded units. The training attendance information provided by LASD for the training offered on March 12, 2024, again placed the Department above the 95% needed for compliance with this provision.⁵ Additionally, because the MT's stops audit and the AAB reviews have shown evidence that the training was falling short, LASD has and continues to work to identify training shortcomings

⁵ In the past, the MT cross checked training attendance rosters to station rosters in order to verify deputy training attendance, but the MT has now found the LASD tracking methods to be reliable for that purpose. The MT will no longer conduct its own verification processes on the constitutional policing, bias-free policing, or roll call trainings unless there are indications that further review is needed.

and improve the training that is provided.⁶ As a result, the monitors have determined LASD is now in sustained compliance with this provision.

b. Quarterly Refresher Roll Call Training

- The Department is in compliance with the roll call training for 2023 (SA Paragraph 71).

LASD has reached compliance with the requirement to provide AV deputies with quarterly refresher roll call training addressing constitutional policing, bias-free policing, and housing requirements (SA Paragraph 71). Roll call training delivery and attendance is reported quarterly, but compliance is assessed annually based on the calendar year. These trainings have been approved and provided to deputies for several years, but compliance for a one-year period was achieved for the first time in 2023, as verified by LASD reporting in this reporting period. The Department continued to provide this roll call training to deputies in the first quarter of 2024.⁷

Because the training materials and scenarios have not changed since January 2019, the parties have agreed that the scenarios used in these roll call trainings are repetitive and have become stale for deputies. Additionally, reviews and audits of stops called into question the effectiveness of the trainings. In the next reporting period, the MT and the Parties will revisit discussions regarding the enhancement or replacement of the current SA Paragraph 71 roll call training sessions. If LASD does not continue to show progress in revising or replacing the roll call trainings, they will be at risk of falling out of compliance.

c. Other Roll Call Training Topics

In the last reporting period, in response to reviews of stops and uses of force provided by the MT and DOJ, LASD-AV stations provided 12 one-time roll call briefings related to professionalism and use of force during stops. The MT and DOJ reviewed the related documents and provided feedback to LASD before the briefings were implemented at the stations. (Briefings related to force are discussed in the Use of Force section.)

In this reporting period, in response to MT and AAB audits, OCP and the Training Bureau provided the AV captains with guidance on Department expectations regarding backseat detentions (BSDs). The MT and DOJ provided feedback on two documents related to that guidance. The first document is a new LASD training bulletin regarding the use of force on subjects held in the backseat of LASD vehicles and is intended to be distributed to the entire Department. The document provides guidance for deputies to help mitigate the use of force and prevent injuries to deputies while detaining subjects. The MT appreciates the initiative that has been shown by the Department to use the audits to identify issues and concerns requiring attention, and we note that the additional step of sharing this information

⁶ It is a requirement of the approved compliance metrics for training that, when evidence arises that an SA-required training is falling short of meeting its intended objectives, the Department will assess and revise the training as needed to address its shortcomings.

⁷ See footnote 5.

throughout the Department is laudable. We encouraged LASD to create roll call briefings for the AV to reinforce topics in this training bulletin. The roll call briefings should provide deputies with examples of how to apply the principles and expectations identified in the training bulletin, including discussion of context and examples. We also noted that if LASD would like the training bulletin to count toward compliance with specific paragraphs, LASD will need to identify which SA provisions the material is intended to address and submit drafts of the AV station roll call briefings for MT and DOJ review, comments, and approval.

The second document will be used to inform AV station captains of information related to the legal and SA requirements for conducting a backseat detention and the associated required documentation. It is intended to keep AV station captains current on relevant topics so they can provide staff with the latest information related to compliance.

These efforts demonstrate that LASD is taking MT and AAB audits seriously and is working to take corrective action when needed. This is another signal to the Monitors that LASD is invested in ensuring progress is made with the implementation of the SA, accountability, and culture change in the Department. That said, while we acknowledge and support LASD's sense of urgency in implementing new or revised trainings, we also note that there is an SA-required process to establish compliance. As we have reiterated with the Department during this reporting period, in order for any trainings to contribute to a compliance determination for an SA-related provision, trainings must be submitted to both the Monitors and DOJ for approval. For trainings currently in compliance, if LASD does not continue to assess and, as appropriate, revise those trainings when audits or other reviews indicate that the course may have shortcomings, they will be at risk of falling out of compliance.

d. LASD Training Enhancements

As discussed in the previous semi-annual report, LASD's Office of Constitutional Policing (OCP) agreed with the MT and DOJ that the content of existing training was too often not reflected in deputy conduct in the field or in supervisory and managerial reviews. LASD decided that, in addition to development of new SA-required trainings, there needed to be a review of all existing trainings to ensure they support the goals of constitutional and bias-free policing and SA requirements. That review was conducted over the past year and led to several developments.

To ameliorate issues with the efficiency, coordination, and consistency of training delivery across the Department, LASD developed a plan to consolidate training and in June 2024 announced that two captains had now been assigned to lead the newly structured Training Bureau. One will focus on Academy training while the other will focus on advanced officer training.

In the last reporting period, LASD sought training and technical assistance that is provided through the US Department of Justice's Collaborative Reform Initiative Technical Assistance Center (CRI-TAC), which is funded through the US DOJ Office of Community Oriented Policing Services (COPS). CRI-TAC training experts conducted a review of the LASD training program in April 2024. LASD expects to receive CRI-TAC's assessment and recommendations early in the next reporting period, which will then be used to implement recommended changes.

As reported in previous semi-annual reports, among the concerns raised in MT, DOJ, and, subsequently, LASD reviews, were that some deputies have been treating community members in a fashion that is not in alignment with procedural justice and is contrary to LASD policy, training, and the SA (see also the Bias-Free Policing, UOF, and Accountability sections). This includes deputies not introducing themselves, not explaining the reason for their actions, and not treating individuals in a professional manner. In addition to the roll call briefings described above, LASD has chosen to address this key training issue with a new training delivered by a group of external trainers, titled, “Why’d You Stop Me” (WYSM). This training session focuses on deputy–community interactions and communication, including the concepts of procedural justice and the importance of deputy wellness to ensure better service to the community. The MT and DOJ observed the training and made recommendations, some of which were adopted by the trainers. LASD received permission from the MT and DOJ to pilot test the WYSM training, which has since been offered to LASD AV deputies eight times in this reporting period, with the last session occurring on June 20, 2024. Primarily through AAB audits and BWC review, LASD will determine whether this training, combined with the stops and bias-free training, is having the intended impact on AV deputies, that is, if the principles taught in the training are being applied in the field. The parties will consult in the next reporting period to determine if LASD will continue using this training. If the training continues, the parties will need to determine which distinct SA training requirements the WYSM training fulfills or reinforces, if any. While WYSM may not sufficiently meet all the requirements for the trainings outlined in the SA sections related to stops and community engagement, the MT nevertheless asserts that the training is engaging and additive to the approved trainings to the SA.

The SA requires review and approval of all SA-related training prior to implementation. Along with enhancements to existing training discussed earlier, LASD is also close to completion of several key SA-related policies which will require changes and additions to several of their current trainings, including training for force, complaints, and supervision. The MT, DOJ, and LASD created a spreadsheet to track each step of the training process. This will provide the parties with clarity on which trainings (or parts of training) are SA related and up-to-date information on training development and MT/DOJ reviews.

e. Supervisor and Management Training

Among the cases highlighted by the MT and DOJ over the past several years were numerous cases where supervisors and station leadership reviews did not identify or address deputy behaviors that did not comply with policy or SA requirements or best practices in policing. LASD has recognized the need for additional training for supervisors and managers.

LASD has begun to make progress in this area by redesigning its basic supervisory course, which all sergeants must attend as part of their promotion. The training will emphasize the need for supervisors to conduct a thorough and effective review of the work by deputies in the field with an emphasis on improving supervisory accountability. Meanwhile, there is evidence the new AV station captains are holding supervisors increasingly accountable for quality supervision: those efforts will be supported if training staff ensure supervisors are provided with adequate training to perform their role.

While lieutenants and captains have continued to receive their required certification training, along with training on particular management topics and roles they fill, the OCP has identified other external

executive training and professional development opportunities to further develop command staff and expose them to best practices from around the country. LASD has begun sending managers to these training sessions, including courses and sessions offered by groups such as the Police Executive Research Forum, the FBI's National Academy (NA) and Law Enforcement Executive Development Seminar (LEEDS), the Police Executive Research Forum (PERF), and the California Command College, among others. Doing this signals an increased awareness and commitment on the part of LASD's executive staff that the objective of achieving lasting transformation in the organization's culture is predicated on enhancing skills and pursuing continuous performance improvement at every level in the Department.

2. LASD Management Increased Involvement and Oversight

The MT noted welcome changes and acknowledgments of improvement being made at the stations while conducting on-site observations during this reporting period. Through our observations and discussions with sergeants at the AV stations, there was regular reference to station leadership sending report assignments back to deputies for additional clarification and completeness. Captains at both AV stations also began sending out regular emails to supervisors to keep them informed of trends observed and to provide direction for improved supervision of deputies in the field. For example, if a substandard tactic is used by a deputy, station captains ensure the deputy was appropriately counseled about the specific issue. A Lancaster sergeant described these emails sent by the station captains as providing clarity of direction that has helped staff complete their required supervisory reports in a more timely fashion because the expectations are clearer, and feedback is more immediate. The captains often ask the roll call briefing sergeants to discuss issues that arise with the deputies so they can all learn from the event. This level of regular feedback regarding performance is occurring at a much higher level than the MT had observed in previous years. MT members have now observed station captains interacting directly with staff to discuss areas for improvement. Throughout our site visits, it was clear in the statements from AV personnel that the station captains communicate more regularly with staff and are available to meet with staff to resolve issues as they arise.

As an example, during a roll call briefing observed by the MT, there was a discussion between a station captain and a deputy about the backlog of incident reports due to late submissions by deputies. As frustrations were expressed by some deputies about the amount of paperwork required, several other deputies spoke up and said that they understood the workload stresses but that the community deserves to have the crimes against them documented promptly because it could affect if a person is apprehended and charged for the case. Toward the end of the discussion, one of the AV station captains clearly emphasized the policy requirement to complete reports in a timely fashion and at the same time offered suggestions to ensure staff had sufficient time available to meet these requirements.

Any effort to move an agency's culture forward by embracing contemporary and more accountable law enforcement practices requires engaged and present leadership to provide clear and consistent direction. The MT observed that the station captains are providing a unified message and reinforcing it throughout their commands. Based on this and other MT observations and in the course of our ride-alongs, it appears deputies and sergeants are increasingly receiving the messaging regarding the station captains' expectations and priorities and incorporating it into their work. The MT is encouraged by the improvements we have observed in the station captains engagement and expects to see

continued progress being made toward achieving the goals laid out by the current administration and the SA.

3. Use of Data and Modernizing LASD's Stops Data Management Systems

- The Department is not yet in compliance with the SA's data analysis and assessment requirements of SA Paragraph 46 or with the preface to the Stops section, which states: "LASD shall ensure that investigatory stops and searches are part of an effective overall crime prevention strategy, do not contribute to counter-productive divisions between LASD and the community, and are adequately documented for tracking and supervision purposes" (p. 7).
- We note that the Department is either not in compliance or in partial compliance with data analysis requirements addressed elsewhere in the SA, including disparity assessments (Paragraph 68), the Data Collection and Analysis section (Paragraphs 82–86), and use of force data analysis (Paragraphs 110–123). Each of those paragraphs and several others in the SA are directly related to the discussion about the need for improvements in the capabilities of the data systems, data analysis, and use of data to inform practice discussed in this Stops section.

The Department remains out of compliance with most data analysis and crime prevention strategy requirements. That said, substantial progress has been made in this reporting period. As discussed further below, the scope and expertise with which station managers use data continues to progress. The Department has developed very useful data dashboards to assist station managers with data analysis and assessment. The Department also continues to develop ways to improve the reliability and useability of their data systems, including exploring a replacement for the outdated computer-aided dispatch (CAD) system.

As discussed below, the AV stations have yet to establish formal crime prevention strategies, but those strategies are in development and the captains have been applying the principles of such strategies to specific issues and reporting on them, albeit too briefly, in the CMF.

a. Data Management System

The MT has long noted and highlighted the need for LASD to upgrade and enhance its software systems to better meet its myriad data collection, analysis, and reporting needs. In that regard, the Department has continued with the process for obtaining and implementing a new CAD and records management system. Also, in response to the need for modern systems to support the completion of needed supervisory and management reviews and reporting, LASD is working to identify software products to replace and consolidate LASD's reporting systems for training, use-of-force reports, administrative investigations, pursuit reports, and discipline tracking. A new online reporting system will help to streamline report writing for deputies and supervisors, provide instant submission of documents, simplify tracking and reviewing, enable automated alerts, and expand LASD's capacity for statistical analysis and reporting. LASD advised the MT that they are considering next steps in moving forward with the procurement process for the new system.

Unfortunately, the stops analyses currently conducted by the Department are dependent on the use of CAD stop information, which has significant limitations. Those limitations have been discussed in our previous semi-annual reports and include not being able to track enough detail related to each action taken during a stop, a significant error rate that has been seen in CAD data entry by deputies, and space limitations in the narratives where deputies describe the reasons for searches and detentions. The Department has acknowledged the shortcomings of the antiquated CAD system and has taken steps to use an alternative system to temporarily serve as the Department's primary data collection interface for stops data. The Department already uses the Sheriff's Automated Contact Reporting System (SACRS) data system to collect the state-mandated Racial and Identity Profiling Act (RIPA) stops information, which is a more modern application than the current CAD system. SACRS currently captures nearly all the SA-required data. It also holds more detailed information about stops than CAD and has greater capacity for deputies to enter narratives that thoroughly describe their actions.⁸ Adopting the SACRS system would help reduce human errors in data entry, producing more reliable and thorough information to assist LASD with reaching compliance with the SA as it relates to documentation and analysis of stops. To be used to fulfill the SA's various data analysis requirements, SACRS needs to be modified to accept a few additional SA-required data points.⁹ In this reporting period, the MT has provided TA to LASD to help identify those additional data points and to confirm that the new system will be a better option than the current CAD system.¹⁰ The MT expects the Department to provide the MT with updates on the modifications to SACRS in the next reporting period.

b. Public and Internal Data Dashboards

As discussed in the last report, a *public* dashboard of SACRS stops data was launched in October 2023 and continues to provide the community with virtually real-time reporting about LASD activity in the AV and across the county.¹¹ Community members and the public at large can find their city or area and filter by data categories depending on their topic of interest. There is also a mapping capability to view the concentration of stops in an area. This was a significant step forward for the Department.

LASD has advised the MT that their newly developed *internal* stops dashboard will be released to the AV captains in the next reporting period. The internal stops dashboard will provide much of the same information found in the public dashboard, along with more detailed information for AV station

⁸ For example, when a deputy documents a backseat detention (BSD) in the existing CAD, the deputy needs to remember to add a narrative that describes the legal justification for the BSD in the narrative field for the stop. Conversely, in the SACRS system, when the box is checked to indicate a BSD occurred, a pop-up box will appear requiring the deputy to enter the justification for the BSD prior to moving to the next part of the form.

⁹ The Department already uses SACRS as the source for stops data displayed in their public and internal dashboards, but most stop-related data review and analysis functions still rely on CAD.

¹⁰ Department data systems need to meet the data collection requirements of SA Paragraphs 44 and 81. The data collected needs to be sufficiently thorough and reliable to facilitate managerial tracking of multiple areas of the SA, such as searches (Paragraphs 46, 50–56), supervisory review of stops (Paragraphs 58–63), bias-free policing and potential disparities (Paragraphs 64, 67, 68), stops data analysis (Paragraphs 82–86), UOF data analysis (Paragraphs 120–123), and overall compliance assessment (Paragraph 153).

¹¹ See <https://lasd.org/transparency/ripa-dashboard/>

managers and supervisors. Importantly with this dashboard, a supervisor will be able to view deputies' stops-related information, such as types of stops, actions taken during the stop, the outcomes of the stop, and the demographics of those stopped. The MT has provided feedback and TA to Department software developers on this important tool for analyzing and reviewing data. The dashboards will help AV station captains, lieutenants, and supervisors more easily conduct regular reviews of deputy activities and determine whether increased supervision, mentoring, training, or other corrective actions are necessary. The dashboards will help managers to recognize and decipher trends across individual deputies, units, or the station as whole and use that information to make any changes to practice indicated by the findings and to inform their crime prevention strategies.¹²

c. Analysis of Data and Application to Practice

Throughout the years of monitoring, the MT has reinforced the importance of and need for meaningful analysis of available data to better assess crime prevention strategies and tactics in the AV and to understand which ones are or are not working. As discussed in the section above, AV station captains are improving their application of data analysis in their CMF presentations. Although there were only two CMFs this reporting period, the MT was pleased to see that one of those included a presentation that included a thoughtful review of data related to crime and traffic collisions in an area experiencing a high amount of activity, along with a discussion of the number of citations written. The AV stations' responses to the high number of fatal collisions in the AV, which involve a task force with other law enforcement agencies, focus primarily on increased enforcement but also include problem-solving strategies such as assessment of how public education and traffic engineering efforts can help to reduce speeding and hazardous driving. During the CMF, the station captains also shared data related to complaints and the number of uses of force during their enforcement efforts. This is an improvement over past presentations and a good practice to include risk management considerations along with how giving thought to ways that such measures can impact perceptions of community members when assessing the efficacy of the enforcement activities. (See CMF discussion in the Community Engagement section.)

Work remains to fully establish routine engagement with and analysis of available data. This should be a key element of station managers' development of and assessment of crime prevention strategies. Further, the MT has discussed with AV station managers how these types of assessments would be ideal applications of the SARA (scanning, analysis, response, and assessment) problem-solving process that can be used at multiple levels. Station managers can apply SARA to enforcement actions and strategies to track their impact, improve or revamp them as needed, and determine whether those tactics and strategies are ones that should be continued, refined, or replaced. As the assigned Department staff work with the affected communities on particular issues, SARA can help ensure meaningful and informed decisions are made about the best way to address the problem, including collaboration with

¹² For example, station leadership can easily create lists of the deputies with the most searches, consent searches, backseat detentions, and other important activities, or deputies representing outliers for concerning outcomes. If a deputy has a low number of stops but a high number of stops with the use of force, the supervisor can easily identify this pattern and determine the best next steps.

community members and better use of external resources. It is essential that all strategies and tactics undertaken be routinely assessed to determine not only their effectiveness but whether there might be unintended consequences such as an impact on fair treatment and community trust (see preface to SA Stops section and Paragraph 68). This is another opportunity to apply SARA as station managers synthesize the results of stops data analysis with information gleaned from other sources, such as complaints, community surveys, the CACs, and community engagement activities in order to assess whether law enforcement activities result in any form of disparate treatment or have other unintended impacts. If so, further analysis and assessment need to be conducted in order to understand why and to reduce or eliminate them to the extent possible.¹³ Crucial elements of this endeavor require the effective use of the data and meaningful community engagement with members in those affected areas.

d. LASD Collaboration with the Center for Policing Equity

Over the last year, LASD partnered with the Center for Policing Equity (CPE) to analyze stops conducted in cities patrolled by LASD deputies, including in the Antelope Valley. CPE also agreed to provide LASD with feedback regarding existing enforcement efforts in the AV, including the community perspective. Additionally, it is the MT's understanding that CPE will help the Department with the analysis and interpretation of data required by multiple SA paragraphs. In the last week of this reporting period, at the end of June, CPE conducted a site visit in the AV to seek community input as part of their assessment. The MT looks forward to hearing from CPE regarding their takeaways from the visit. CPE expects to provide the AV stations with the first view of the findings from their data analysis in the next reporting period. The MT looks forward to learning whether LASD determines the findings to be of help and what the Department's response is to any recommendations.

CPE is also developing a use-of-force dashboard for each AV station to monitor such things as the type of force, location, and day of the week, as well as the demographics of the subject of the force. The dashboard will be customizable to meet LASD's needs and can be adapted for use for other key topics, such as encounters involving unhoused individuals or individuals with mental health or substance issues. The Department will be reviewing these dashboards and comparing them to the internal Performance Oversight Information Tracker (POINT) dashboards to determine whether both types of data visualization interfaces are needed.

The MT has recently been invited to join monthly progress meetings. The MT has not yet reviewed CPE reports related to the AV, but in meetings we have found the CPE staff to have strong expertise in the subject areas they are addressing and particularly able to communicate clearly and frankly about complicated topics ranging from data analysis methodologies to disparate impact on community-law enforcement relations. This bodes well as the process continues. Moving forward, LASD will need to create and implement a long-term plan to regularly conduct assessments of LASD stops activity in the

¹³ See the Crime Prevention Strategies box in this section, which says, "It is incumbent on LASD to use the data to identify any disparities and address those findings. In some circumstances, there may be a reason for a disparity, but LASD must be able to clearly explain the reasons for the disparity and their efforts to ensure its decision making and/or enforcement direction is free of bias or disparate impacts."

AV community and identify any interventions needed to address disparities of enforcement. CPE and LASD both hope to continue their partnership as the work continues, which the MT supports, although the details of their relationship following the current scope of work have not yet been finalized.

4. Body-Worn Camera Policy and Reviews

LASD, County Counsel, DOJ, and the MT continued to discuss revisions to LASD's BWC policy in this reporting period. The MT and DOJ provided feedback and shared concerns regarding current BWC practices and the draft policy. LASD leadership was open to the feedback, and we expect another revision to the policy to be submitted in the next reporting period.

As shown in the MT and DOJ case reviews reported in the last two semi-annual reports, numerous instances of inappropriate behavior by LASD-AV deputies and sergeants have been observed in BWC footage. Previous reviews that had to be based solely on the written reports and CAD entries completed by the deputy were not sufficient to identify the type of policy violations that have subsequently been observed in BWC footage. The MT has continued to encourage LASD to formalize a policy to allow and require supervisors to randomly review deputy stops. The random review of deputy stops is a best practice in law enforcement because staff need to understand their work will be regularly reviewed by supervisors to ensure compliance with policy and training and improve accountability.

In the last reporting period, LASD drafted a list of questions for supervisors to use while reviewing BWC footage, but use of the list has not been implemented. The current BWC policy does not allow LASD supervisors to conduct random audits of deputy incidents. LASD understandably prioritized the completion of the use-of-force policies in the meet-and-confer process. LASD leadership, content experts, and County Counsel are working with the MT and DOJ to continue refinements to the BWC policy. Since BWC video provides a substantially more reliable and detailed understanding of deputy field work than CAD and other reporting, it is important for supervisors to proactively audit BWC footage for accountability purposes and to ensure community needs and services are addressed in a timely and professional manner. BWC video review will also be an element of the AAB audits (see below).

In the meantime, AV station captains continue to report that they require supervisors to watch BWC footage of their staff when reviewing force, complaints, or other activity called to their attention. They also reported conducting critical reviews of various events to confirm accountability and to also recognize situations in which deputies exhibit exemplary performance.

5. Crime Prevention Strategies

While the AV stations do not yet have formalized crime prevention strategies in place, the MT has noted the new captains at both stations have brought renewed energy and focused attention on the development and application of such strategies as one facet of their crime reduction efforts. During the February and April 2024 site visits, AV station captains provided the MT with updates about the efforts underway to develop such crime prevention strategies. The MT provided station captains with initial feedback following their verbal presentations. Subsequently, the Palmdale operations captain sent the

MT a draft of his plan, which included three strategic goals: (1) reduce crime (particularly retail theft and graffiti), traffic collisions, and blight; (2) increase trust between the community and law enforcement; and (3) improve service quality. The MT is reviewing the draft and will provide LASD with feedback.

In the meantime, the AV station captains have been applying problem-solving tactics to some of the issues they have been addressing and then reporting on those efforts in the Crime Management Forum meetings. Due to time constraints in the CMF, these discussions tend to be rather brief and lack the specificity necessary for the MT to fully understand how the strategies are being implemented and if they are being routinely assessed for effectiveness. For example, both stations have focused significant efforts on reducing response times to calls for service. This was done to address community complaints about long wait times and LASD's desire to ensure deputies are being attentive to pending calls for service. Station crime analysts provide reports that document response times to calls. Using those reports, the station captains are considering whether it may be preferable to realign shifts to provide more staffing during those time frames in which high call volumes are routinely experienced. They also limit special enforcement operations involving patrol staff during those times. The station captains have reported seeing some improvements in lowering response times and positive reactions from community members. Although the AV station captains discuss these tactics in the CMFs, the CMF presentations do not yet provide enough information for the MT to fully assess these efforts.

The AV station captains have also been looking at crime prevention strategies and techniques used by other agencies. For instance, the Palmdale captain created a "micro survey" to gather community input in specific Palmdale neighborhoods. The micro survey followed the example from another agency that has had success with its "micro" or neighborhood-based crime prevention strategies in that jurisdiction. The input derived from these surveys can be used to inform the discussion about crime prevention options that are available and guide the development of appropriate tactics that can be applied in various neighborhoods patrolled by the Palmdale deputies.

Crime Prevention Strategies

The Settlement Agreement states:

"LASD shall ensure that investigatory stops and searches are part of an effective overall crime prevention strategy, do not contribute to counter-productive divisions between LASD and the community, and are adequately documented for tracking and supervision purposes." (p. 7)

Crime prevention strategies, also referred to as crime reduction plans, facilitate an organized and consistent approach to crime intervention and prevention based on manager-driven priorities and tactics, data-guided decision making, effective and efficient allocation of resources, and accountability. They also provide a framework for gathering and incorporating community input so that community members are co-producers of public safety.

Although there are a variety of approaches to crime prevention strategies, at a minimum, effective strategic plans include common elements such as goals, objectives, directed activities, data collection and analysis,

and designation of staff assignments and timelines for completing specific tasks. They also incorporate community perceptions and input regarding enforcement priorities and crime prevention activities. Implementing the plan requires the support of divisional managers but is directed and conducted at the station level.

Input from AV community members can be gathered through numerous avenues, including the CACs, the annual Community Survey, community engagement events, one-on-one engagement with community members (recorded as stat code 755 in the AV), and designated meetings to discuss specific issues or areas. The SARA problem-solving model and LASD's policy for Community Policing and Engagement (Manual of Policies and Procedures [MPP] 301-110-00) are tools the Department already has in place that can help in providing a framework as well as documentation of these efforts.

Well-developed crime prevention strategies serve to clarify organizational goals and reinforce how and why particular tasks are undertaken in support of those goals. In turn, everyone involved must understand their role in carrying out their respective tasks and how this relates to achieving the intended results.

Management is then responsible for monitoring and accurately assessing whether the tasks or activities that are being utilized are having the desired effect and/or might potentially be contributing to unintended or harmful results. Evidence, or even mere perceptions, related to those effects might be revealed through the data and information that are tracked—and this can reveal whether there are signs of potential disparate treatment amongst particular populations. It is incumbent on management to be mindful of and attentive to those possibilities (see SA Paragraph 68). Reaching reliable conclusions involves reviewing many sources of data and information, such as Deputy Daily Work Sheet (DDWS) reviews, reviews of reports, and supervisory observations of deputies in the field. Stops and call-for-service data and other enforcement information should also be routinely examined. It also requires doing more than just analyzing the actions of individual deputies, it requires being attentive to the impact of the broader enforcement efforts taking place and the potential for unintended consequences that are contrary to what the overall goal was.

For example, the overreliance on vehicle stops in an area to address traffic safety issues or criminal behavior could have a disparate impact on a specific segment of the community or a neighborhood. It is incumbent on LASD to use the data to identify any disparities and address those findings. In some circumstances, there may be a reason for a disparity, but LASD must be able to clearly explain the reasons for the disparity and their efforts to ensure its decision making and/or enforcement direction is free of bias or disparate impacts. Compliance with the SA requires clear evidence that LASD management both holds deputies accountable for engaging in bias-based practices and identifies and addresses any LASD enforcement strategies that result in bias or disparate impacts in the community.

6. LASD Audit and Accountability Bureau (AAB) Audits

A new AAB captain was appointed in the last reporting period and has continued the positive efforts of the previous interim captain in collaborating with the MT and DOJ and seeking review of AAB's work in auditing stops by deputies in the AV. MT and DOJ approval of AAB stops audits is not required by the SA, but this is an excellent practice, because both the MT and DOJ bring experience that will help AAB develop auditing capabilities of the unit.

a. *AAB Interim Audit of Stops*

In May 2024, AAB published an audit of stops titled: "Stops and Detentions Interim Audit, Project No. 2023-7-A."¹⁴ The Interim Stops Audit reviewed 50 stops conducted by LASD deputies in the AV from April 15, 2023, through May 15, 2023. The interim audit focused on assessing the policy requirements for (1) the initiation of stops and detentions, (2) consent searches, (3) probation or parole searches, and (4) backseat detentions. The audit found LASD deputies out of compliance for not recording the enforcement stops on BWC for the length of the interaction and for improper documentation in each of the four audit areas. While still out of compliance, AAB found that the stations performed marginally better during this period than in the earlier MT stops audit. There was evidence the deputies were aware of the detained person's search conditions prior to conducting a probation or parole search; however, the deputies did not document the searches properly in CAD as required by policy. AAB identified several areas for improvement that the AV stations need to devote increased attention to, including the following.

1. Enable patrol station supervisors to conduct routine audits of BWC video recordings for adherence to LASD policies during stops.
2. Provide training covering policy requirements regarding professional behavior during interactions with community members during stops. Initiate Performance Log Entries for deputies who frequently engage in unprofessional behavior.
3. Provide training at the AV stations to ensure they understand the requirements and provide an introduction and the reason for the stop at the beginning of the stop.
4. Provide training to LASD deputies to reinforce the requirements to record the request for a consent search of a person or vehicle and the detained person's response, and to properly document stops.
5. Recognize deputies for proper documentation to reinforce the proper documentation of knowledge of parole or probation conditions before a search of a detained person.
6. Provide training to LASD deputies to ensure proper documentation of parole and probation searches as required by policy.
7. Provide scenario-based training to deputies to properly explain the reason for a backseat detention to the detained persons and properly document the backseat detentions in CAD.

¹⁴ https://lasd.org/wp-content/uploads/2024/04/Transparency_Audit_2023-7-A_Stops_and_Detentions_Interim_Audit-_Antelope_Valley_Stations.pdf

b. AAB Micro Stops Audits

AAB has developed a plan to conduct smaller audits of stops in the AV, which would provide the stations with more timely feedback about the stations' performance. The MT and DOJ support this approach, which is already being applied to use-of-force and complaints audits. More timely audits help the stations adjust training and accountability practices more quickly. These sorts of audits reinforce the contributions and value AAB can provide in furthering LASD's accountability objectives and ensuring constitutional policing practices continue once the oversight provided by the MT as part of the SA is over.

The MT provided TA at several stages of the development process for these smaller audits, and the MT and DOJ reviewed and provided LASD with feedback on the audit schedule and individual audit plans. The schedule for 2024 includes audits of the following topics: BSDs, supervisory reviews of Deputy's Daily Worksheet (DDWS), domestic violence-related BSDs, consent searches, and parole/probation searches. Each audit will involve the review of BWC footage to assess the items specifically listed in the audit plans. Additionally, whenever BWC footage is reviewed, the Department will assess various aspects of the stop, including the proper activation of the BWC for the duration of the encounter and the quality of the interaction in terms of procedural justice. They will note any observed policy violations even if they are not specific items the auditor is looking for in the specific audit. The MT particularly acknowledges the audit focused on supervisory review of DDWS logs, which will focus on key SA-required processes, as it is a strong indication that AAB is truly committed to improving practice and being tangibly helpful to the stations.

In our feedback, the MT noted two areas to address in future stops audits, which the AAB captain confirmed would be addressed in the second half of 2024.

- The audit plans indicated AAB will review consent searches conducted by deputies. The MT suggested AAB look at all stops that included a request for a consent search when made by a deputy and whether or not a search was conducted by deputies. It is important to broaden the audit population in that way because the SA has requirements related to the request for consent. First, all consent search requests must be reasonable. (SA Paragraph 51). Second, all requests for consent need to be recorded (SA Paragraph 52).
- Currently, AAB uses CAD to identify sample populations for the assessments. As has been previously discussed and agreed upon by all parties, the CAD has significant shortfalls for tracking stops activity in the AV. As a result, the MT was advised by LASD that revisions to the SACRS system are being explored to collect more reliable data for each stop.

Once LASD completes the first round of five audits for the AV stations, they have stated they will submit the documents to the MT and DOJ for feedback prior to publication. This will allow the MT and DOJ to suggest edits and additional recommendations before the next round of stops audits in the second half of 2024.

7. Successes and Obstacles

As described throughout this section, the MT has seen the new AV station captains taking a more direct and hands-on approach in providing thoughtful and intentional leadership, with more emphasis on accountability. It is clear the new station captains intend to hold staff accountable for completing reports in an accurate and timely fashion. They regularly visit the roll call sessions to brief deputies on current events and provide direction about expected behaviors. The assignment of two captains at each of the AV stations has clearly helped the compliance and supervision efforts in the AV. As further described in the Community Engagement section, the captains have engaged the community in new ways and are striving to develop new and improved relationships. These are all highly positive developments. The stations are also developing processes for tracking community input on crime priorities and concerns; this will be helpful for informing and refining their crime prevention strategies and for assessing the impact of enforcement activities on the community. Additionally, LASD has created dashboards to use the SACRS stops data to better understand and evaluate stop patterns and practices by LASD deputies in the AV. This is a positive development, and LASD is very close to providing the AV station commanders with a stops dashboard built for internal use. This will provide AV station leadership with the tools and data needed for assessing their crime prevention strategies and for assessing the stops made by individual deputies should remedial actions be necessary.

As this work continues, there are a few areas that the MT expects increased attention from the stations in the next reporting period.

The AV station captains need to document formal crime prevention strategies for their stations, so staff clearly understand what strategies the station intends to carry out and what their role in this will be.

The SA requires LASD to create and implement a plan for regular assessment of AV deputies' knowledge of LASD policies and training related to the SA, including search and seizure law, bias-free policing concepts, and procedural justice concepts (see SA Paragraphs 164 and 166). These types of assessments will help identify learning gaps and establish the training topics and schedules for AV deputies and units.

Most urgently, LASD needs to continue its efforts toward revising the BWC policy to allow supervisors to conduct random reviews of stops by deputies to ensure compliance with LASD policy. In the meantime, further steps should be taken at the AV stations to formalize the use of BWC in regular stop reviews. The regular review of BWC footage is important at two levels: for supervising and mentoring individual deputies, and for managerial monitoring of unit-level performance and trends. The MT and DOJ reviews have found that the use of BWCs is the most reliable method for conducting reviews that "ensure that unlawful stops, searches, and seizures are detected and effectively addressed" (SA Paragraph 58). Random audits by supervisors is a best practice in law enforcement, and there have been numerous cases brought to LASD managers' attention of policy and SA violations observed on BWC footage that could not have been identified through written reports alone. Further, this work is already a regular part of supervisors' responsibilities as per SA Paragraph 59, although the SA does not formally include review of BWC videos (because it was signed before BWCs were implemented). We note that a recommendation made in the AAB interim stop audit (described above) was for the BWC policy to be

amended to allow a random review of stops using BWC footage. The MT is encouraged by this recommendation as it is another indication that AAB is committed to providing meaningful feedback to the stations with meaningful recommendations.

8. Next Steps

a. *LASD*

- Finalize the BWC policy.
- AAB provide the MT with their completed stops audit reports using the methodologies approved this reporting period and their plans for any upcoming stops-related audits.
- Complete draft crime prevention strategies and submit them to the MT and DOJ for review and comment.
- Update training in response to the MT stops audit and ongoing audits by AAB, keep DOJ and MT updated on progress in this regard, and, when appropriate, submit documentation for feedback and compliance assessment.
- Review and implement CRI-TAC training recommendations as determined to be appropriate and agreed to by the parties.
- Develop training for managers and supervisors in the use of the new stops dashboards.
- Develop a process whereby station managers and supervisors consistently meet the stop reviews required under Paragraphs 58–63. Then develop related training for managers and supervisors.
- Complete assessment of SACRS as a replacement system for CAD to capture data related to stops.
- Continue work to incorporate data into daily processes, including modernizing data systems, implementing data dashboards and early intervention systems, and follow through with the application and utilization of the SARA problem-solving model in the AV stations and in the CMF.
- Provide the MT and DOJ with analysis plans, updates to progress, and any reports completed by CPE.
- Review and implement CPE recommendations as determined to be appropriate and agreed to by the parties.

b. *The MT*

- Conduct a focused review of the work of embedded units that conduct stops and enforcement in the AV and provisions not addressed in the MT stops audit.
- Provide timely reviews and feedback on documents submitted by the Department to the MT.
- Along with DOJ, review any new training curricula and observe sessions.
- Continue to participate in meetings and provide technical assistance on data systems, dashboards, data analysis, and application to practice.

- Conduct station observations and ride-alongs in the AV to observe activity in the field.

9. Stops Compliance Status Table

Table 1 provides the compliance status for each paragraph in the Stops section.

TABLE 1 STOPS, SEIZURES, AND SEARCHES COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
41	Stops and detentions are based on reasonable suspicion.	Yes 05/15/17	Yes 01/01/24	Yes 09/01/23	No
	Notes: The MT stops audit showed the Department is in compliance with this provision. The delivery of the training is measured in SA Paragraphs 57, 70, and 71.				
42	Elements of procedural justice are incorporated into training.	NA	Yes 01/01/24	Partial	No
	Notes: The principles of procedural justice are incorporated in the eight-hour bias-free policing training. The delivery of the training is measured in Paragraph 70. DOJ and MT case reviews have indicated that the principles of procedural justice are not regularly followed in the field. LASD has recognized the need to consider revising or enhancing this training; the Department has developed a draft plan for this assessment.				
43	LASD-AV does not use race, color, ethnicity, national origin, religion, gender, gender identity, disability, or sexual orientation as a factor in establishing reasonable suspicion or probable cause, except as part of actual and credible description(s) of a specific suspect or suspects.	Yes 05/15/17	Yes 01/01/24	Yes 09/01/23	No
	Notes: See Paragraph 41.				
44	Stops are accurately and thoroughly documented in MDC patrol logs.	Yes 05/17/17	Yes 08/16/18	Partial	No
	Notes: The MT stops audit showed the Department is in partial compliance with this paragraph (in compliance with subsections a, b, c, d, e, f, g, and k; and not in compliance with subsections h, i, and j). The delivery of the training is measured in SA Paragraphs 57 and 70.				
45	Accurate and specific descriptive language (non-boilerplate) is used in reports.	Yes 05/03/16	Yes 08/16/18	Yes 09/01/23	No
	Notes: The MT stops audit showed the Department is in compliance with this provision. The delivery of the training is measured in Paragraphs 57 and 70. See also Paragraph 41.				
46	Efficacy and impact on the community of searches based on probation and parole are assessed.	NA	NA	Partial	No
	Notes: LASD has periodically produced tabulations of statistics related to the number of parole and probation searches. The Department has made progress in this reporting period by engaging with an outside research group to conduct this provision's required analysis and by creating internal reports/processes to reach compliance.				
47	Backseat detentions require reasonable suspicion and reasonable safety concerns.	Yes 05/15/17	Yes 08/16/18	Partial	No

**TABLE 1
STOPS, SEIZURES, AND SEARCHES COMPLIANCE STATUS**

SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
	Notes: The MT stops audit showed the Department is in partial compliance with this provision with regard to policy and training. Related outcomes are addressed in Paragraphs 48 and 49.				
48	Backseat detentions are not conducted as a matter of course.	Yes 05/17/17	Yes 08/16/18	No	No
	Notes: The MT stops audit showed the Department is not in compliance with this provision. The Department was not in compliance with BSDs in traffic stops, and the MT was unable to assess BSDs related to domestic violence calls due to insufficient data.				
49	Deputies respond to complaints about backseat detentions by calling supervisor.	Yes 05/15/17	Yes 08/16/18	Unable to Assess	No
	Notes: The MT was unable to assess this provision in its stops audit due to the Department’s insufficient data.				
50	Deputies do not use race, color, ethnicity, national origin, religion, gender, gender identity, disability, or sexual orientation in exercising discretion to conduct a search, except as part of an actual and credible description of specific suspect(s).	Yes 05/17/17	Yes 01/01/24	Partial	No
	Notes: The MT stops audit showed the Department is in partial compliance with this provision. This provision refers to discretionary searches, which include consent searches and other types of searches. The findings show the Department had 100% compliance for consent searches as related to this paragraph; however, the MT was unable to assess other types of searches (e.g., home-based probation or parole searches) due to insufficient data. The delivery of the training is measured in SA Paragraphs 57, 70, and 71.				
51	Deputies do not conduct arbitrary searches.	Yes 05/17/17	Yes 08/16/18	No	No
	Notes: The MT stops audit showed the Department was not in compliance with the requirement that deputies articulate a valid reason for a consent search. The MT was unable to assess the full provision regarding all discretionary searches due to insufficient data. The delivery of the training is measured in SA Paragraph 57.				
52a	Deputies equipped with BWCs record requests for consent to search.	Yes 05/03/16	Yes 08/16/18	No	No
	Notes: The MT stops audit showed the Department was not in compliance with the requirement that deputies record the request for a consent search and the response. The delivery of the training is measured in Paragraph 57.				
52b	Individuals with limited English proficiency (LEP) are informed in an appropriate non-English language.	Yes 04/08/18	Yes 08/17/18	Partial	No
	Notes: LASD implemented the SA-compliant LEP plan on April 8, 2018. The MT was unable to further assess this portion of SA Paragraph 52 in its stops audit since a full sample was not assessed. The Department was found in partial compliance based on previous complaint reviews, ride-alongs, and community input. The delivery of the training is measured in SA Paragraph 70.				

TABLE 1 STOPS, SEIZURES, AND SEARCHES COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
52c	Outreach is conducted about the right to refuse or revoke consent.	NA	NA	Yes 02/19/19	Yes 02/19/20
	Notes: This requirement was completed with the CACs' assistance and a brochure that is written in English and Spanish.				
52d	Supervisors are notified before home-based searches.	Yes 05/15/17	Yes 08/16/18	Partial	No
	Notes: With regard to Section 8 housing-related searches, the Department is in compliance with this provision. With regard to other types of home-based searches, the MT was unable to assess this provision in its stops audit due to insufficient data. The delivery of the training is measured in SA Paragraph 57.				
53	A reasonable number of deputies are present at a search.	Yes 05/03/16	Yes 08/16/18	Partial	No
	Notes: With regard to Section 8 housing-related searches, the Department is in compliance with this provision. With regard to other types of home-based searches, the MT was unable to assess this provision in its stops audit due to insufficient data. The delivery of the training is measured in Paragraphs 57 and 70.				
54	Section 8 compliance checks require articulated safety concerns.	Yes 03/14/18	Yes 08/16/18	Yes 05/31/19	Yes 02/28/22
	Notes: LASD-AV included this requirement in policy and training and continues to be in implementation compliance based on the lack of any indication of housing-related enforcement activity. See the Housing section for more information. The delivery of the training is measured in Paragraphs 57 and 70.				
55	During home searches, individualized suspicion or probable cause determines who, besides subject of search, is subject to detention or search and for how long they are detained.	Yes 05/03/16	Yes 08/16/18	Unable to Assess	No
	Notes: In previous ad hoc reviews of stops data, ride-alongs, community input, and BWC video, the MT did not observe violations of this provision but was unable to assess this provision in its stops audit due to insufficient data. The delivery of the training is measured in Paragraphs 57 and 70.				
56	Probation and parole searches are carried out only when search conditions are established and in accordance with the Stops section.	Yes 05/15/17	Yes 08/16/18	No	No
	Notes: The MT stops audit found that CAD data consistently failed to articulate how the deputy established the subject's search condition or that the search condition was established prior to the search. The delivery of the training is measured in Paragraph 57.				

TABLE 1 STOPS, SEIZURES, AND SEARCHES COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
57	Constitutional policing training is provided.	NA	Yes 06/14/17	Yes 06/14/22	Yes 03/12/24
	Notes: The Department has been in compliance with delivery of this training since August 16, 2018, for deputies assigned to the AV stations, and since June 14, 2022, for embedded deputies from specialized units. The outcome of this training is measured through the practice provisions of this section of the SA. In response to issues apparent in recent audits, reviews, and observations, the Department is conducting an assessment and may implement revisions to how the constitutional policing principles will be delivered to staff.				
58	Additional accountability and supervision to ensure unlawful stops and searches are detected and addressed.	Yes 05/03/16	Partial	No	No
	Notes: Outcomes for the policy required under this paragraph are addressed in SA Paragraphs 59–63, most of which the MT stops audit found to be out of compliance. The Department will need to develop and implement a reliable process for meeting the requirements of Paragraphs 58–63 and then train supervisors and managers.				
59	Supervisors review CAD logs.	Yes 05/03/16	Partial	No	No
	Notes: The MT stops audit found that LASD-AV supervisors did not provide the required number of reviews required, and the reviews that were conducted were insufficiently thorough.				
60	Supervisors review justification for stops and searches.	Yes 05/03/16	Partial	No	No
	Notes: The MT stops audit found supervisors did not review legal sufficiency with the deputies on any of the three applicable stops.				
61	Supervisors and station commanders address all violations and deficiencies in stops and searches.	Yes 05/03/16	Partial	No	No
	Notes: The MT stops audit found that appropriate corrective action was taken in 32 (91%) of 35 cases where supervisors identified errors, which is below the approved 95% compliance metric.				
62	Supervisors and station commanders track repeated violations of this SA and take corrective action.	Yes 05/03/16	Partial	No	No
	Notes: The MT stops audit found that the Department has various processes in place to track repeated violations, but those processes are not thorough or effective. There is not a singular tracker or process for this purpose.				
63	AV supervisors and commanders are held accountable for reviewing reports and requiring deputies to articulate sufficient rationale for stops and searches under law and LASD policy.	Yes 05/03/16	Partial	No	No
	Notes: The MT stops audit found the Department has failed to institute thorough and reliable practices whereby divisional managers hold unit commanders accountable and station managers hold supervisors accountable.				

C. Bias-Free Policing

In this reporting period, the Department's efforts regarding the SA provisions related to bias-free policing focused on the following. (Several of these items align with those in the Stops section, since there is significant overlap in the work required to achieve compliance with the two sections.)

- Continue to provide the required full-day bias-free policing training.
- Continue to provide regular quarterly roll call training.
- Implement the Department's plan for assessment of and improvements to the training related to stops, bias-free policing, procedural justice, problem-oriented policing, and other areas.
- Continue working with CPE and provide updates, analysis plans, and reports to the MT and DOJ for review and discussion.
- Continue to improve data systems and the use and application of data at the stations, particularly to assess Department activities for potential disparities and respond as appropriate.
- Created a data dashboard listing stops conducted by LASD deputies using the SACRS system.

1. Training

a. *Bias-Free Policing Training*

- The Department is in sustained compliance with the full-day bias-free policing training (SA Paragraph 70).

In this reporting period, the full-day bias-free policing training was offered on March 13, 2024. The training attendance information provided by LASD placed the Department above the 95% needed to reach compliance with this provision.¹⁵ As with the Constitutional Policing training in the Stops section, LASD has also worked to identify and implement revisions to the training in response to the findings of the MT and AAB stops audits.¹⁶ As a result, the monitors have determined LASD is now in sustained compliance with this provision.

b. *Quarterly Refresher Roll Call Training*

- The Department reached compliance with roll call trainings for 2023 (SA Paragraph 71).

¹⁵ In the past, the MT cross checked training attendance rosters to station rosters in order to verify deputy training attendance, but the MT has now found the LASD tracking methods to be reliable for that purpose. The MT will no longer conduct its own verification processes on the constitutional policing, the bias-free policing, or the roll call trainings unless there are indications that further review is needed.

¹⁶ It is a requirement of the approved compliance metrics for SA-required training that, when evidence arises that a training is falling short of meeting its intended objectives, the Department will assess and revise the training as needed to address its shortcomings.

LASD has reached compliance with the requirement to provide AV deputies with quarterly refresher roll call training addressing constitutional policing, bias-free policing, and housing requirements (SA Paragraph 71). Roll call training delivery and attendance is reported quarterly, but compliance is assessed annually based on the calendar year. The Department is in compliance for 2023. The Department also provided this roll call training to deputies in the first quarter of 2024.¹⁷

In the next reporting period, the MT and the Parties will revisit discussions regarding the enhancement or replacement of the current SA Paragraph 71 roll call training sessions.

See the Stops section for extensive discussion of LASD's review of existing training and the steps the Department is taking to revise and upgrade various training courses, including the bias-free policing and roll call trainings. For SA-required trainings currently in compliance, if LASD does not continue to assess and, as appropriate, revise trainings when audits or other reviews indicate that the course may have shortcomings, they will be at risk of falling out of compliance. Also, new or revised SA-related trainings need to be submitted to the Monitors and DOJ for approval prior to implementation.

2. Improved Use of Data and Assessment for Disparities

- The Department is not in compliance with the disparity review of their programs, initiatives, or activities for possible disparities (SA Paragraph 68).

As elaborated on in greater detail in the Stops section, the Department made progress in a number of areas involving the collection, analysis, assessment of findings, and application of AV stops and calls for service data but has not yet reviewed policing strategies for possible disparities.

LASD has been working with the Center for Policing Equity (CPE) to analyze stops for the LASD-AV stations. The CPE has extensive experience in reviewing police stops-related activity from around the nation and within California. The engagement with the CPE began in early 2023, and the Department expects to see a draft report from CPE in the next reporting period. This report will be a significant milestone for LASD in their efforts to identify and address any potential disparities in enforcement in the AV and toward compliance, because this analysis is required by SA Paragraph 68 and as a part of other required assessments that are discussed in the Stops section of this report. If disparities or other unintended consequences are identified in the CPE findings, it will be important to conduct a meaningful assessment of the findings and for the Department managers to reflect on Department practices to determine whether any interventions may be necessary to address activities or practices that may be unconstitutional or contribute to strained relations with the community. For example, in instances where a disparity is identified, the following is a list of the types of questions the Department should explore.

- Has the community been involved in identifying the crime priorities in this area? What type of enforcement is taking place in the neighborhood?

¹⁷ See footnote 15.

- Is any noted disparity the result of enforcement decisions by specific deputies, or could this be due to deficiencies in the strategy or tactics employed in the program?
- Has this enforcement strategy led to a higher-than-average number of complaints in this neighborhood? If so, what are the complaints?
- What has been the impact of this enforcement on the relationship with the community in the affected areas?
- Are there effective alternative responses that could be employed that rely on less enforcement?
- Would deputies engaged in enforcement in these areas benefit from specific training in community engagement or procedural justice?
- Would an increased review of stops by sergeants be warranted to provide deputies with feedback regarding their interactions?
- For enforcement efforts over an extended period, are there regular report and review mechanisms built in to ensure the activity is regularly evaluated?

The Department will need to directly engage with the community to ask these deeper questions to provide context to the data and start conversations and discussions about the causes of the issues and possible solutions. It is laudable that LASD made their stops information publicly available for the community to explore via online dashboards. LASD should also be transparent about the way the stations review that data and about their efforts to ensure that any enforcement disparities are addressed in the AV community. Transparency and self-introspection and correction are key components to building and maintaining trust with the community as well as meeting the SA requirements of Paragraphs 68 and 81–86. CPE has expertise in this sort of effort, and they and the OCP have expressed interest in maintaining their partnership after the CPE data analyses and related assessments are completed.

The MT has noted station captains working more with available data to better understand the enforcement impacts on the community. Progress in this regard has accelerated since the placement of the two captains at each AV station. For example, the captains have monitored uses of force and complaints more closely to examine the results of enforcement actions taken in the field. LASD is working to build the internal reporting mechanisms needed to adequately monitor station law enforcement activities and their positive and negative consequences. Although the station captains are still hampered by inadequate data systems and high workload, especially with regard to ensuring the thoroughness, reliability, and timeliness of the data available for review, they have taken important steps. The Department is close to the completion of an internal dashboard that will provide the station leaders with timely information about stops conducted by deputies in the AV. As described in more detail in the Accountability section, the Department has implemented a dashboard that serves as an early intervention system that automatically alerts managers to deputies and units involved in high numbers of uses of force and other high-risk activities or who receive high numbers of complaints. Additionally, LASD is working to build a dashboard that will provide more timely information related to crime trends in the AV. The stations are also strengthening the CACs, building new partnerships with other community groups, and establishing methods for documenting and tracking the input they receive from the community. The MT also notes more regular use of problem-solving techniques and recent efforts to develop draft crime prevention plans at the stations. While each of these

advancements require further refinements and expansion, they demonstrate that the AV stations are making good progress in establishing the tools, processes, and know-how to make data analysis and assessment of practices a regular part of station operations and to facilitate the reviews needed to identify and develop corrective action plans to respond to disparities and other unintended consequences of policing activities.

3. Incorporation of Bias-Free Policing Requirements Into Personnel Evaluations

- The Department is not in compliance for the incorporation of bias-free policing and equal protection requirements into the personnel performance evaluation process (SA Paragraph 67).

The Department has not developed procedures for supervisors to use when evaluating staff members' capacity to effectively practice bias-free policing and meet equal protection requirements of the SA and the law. The Department needs to provide training and direction to supervisors to ensure they understand how to assess bias-free and equal protection requirements. However, the Department will soon have an internal dashboard to easily access timely information to assess deputy stop practices and allow supervisors to conduct random audits of stops.

4. Successes and Obstacles

AV station captains continue to improve the regularity and thoroughness of their review of the activity of their staff with regard to enforcement activities. At the recent CMF meetings, AV station captains discussed their efforts to closely monitor deputy activity—specifically regarding complaints, uses of force, and aggregate number of stops involving particular activities or conduct, like citations. The new stops dashboards will further help LASD gain a better understanding of stops activity by deputies both in the aggregate and at the individual deputy level. With the new captains now firmly established at the AV stations, the MT has not observed the signs of defensiveness or resistance to feedback and recommendations that had been experienced in dealings with some of the previous leadership at the station level. This has contributed to a much healthier and more effective working relationship.

Additionally, the LASD deputy leading the development work for the new internal stops data dashboard has taken a proactive role in identifying data that would help determine where potential disparities may be present and making that data more accessible to managers through the internal dashboards. This includes, for example, compiling and providing data to help identify the specific location of a stop instead of the current process of a stop location only being identified as part of a broader geographical area. Providing LASD station captains with this enhanced ability will assist with more granular analysis of stops activity. Other data sets will include calls for service, demographic numbers, and crime statistics.

As required by SA Paragraph 67, part of supervisory evaluations of individual deputy performance must use "all available methods to assess the individual's ability to effectively practice bias-free policing." The AV stations need to develop a process by which supervisors can assess this requirement.

As discussed previously, LASD has been evaluating how effective current training has been in incorporating practices of constitutional policing. LASD has been piloting "Why'd You Stop Me" (WYSM)

training, which reinforces the principles of procedural justice and deputy wellness. This training emphasizes treating all people with respect and the importance of managing stress so deputies do not become easily frustrated or drawn into an argument. The instructors challenge students to consider the ways they currently provide service to the community and identify how they can improve those interactions. Bias can affect decision making when the situation is emotionally charged. Providing deputies with strategies to manage stress may help deputies be more patient and provide them with more time to consider their response to a situation more thoroughly. These training concepts represent a best practice in law enforcement and reflect recommendations contained in the *Final Report of the President's Task Force on 21st Century Policing*.¹⁸ The WYSM training is a step forward, but there is a significant need for comprehensive training to address the deficiencies identified in case reviews by the MT and DOJ. The Department has not yet developed the required community engagement training, but the AV stations are making good progress in many areas of community engagement. Productive collaboration with the CACs and other community partners will be integral to ensuring bias-free policing is provided in the AV. (See the Community Engagement section for more discussion.)

5. Next Steps

a. *LASD*

- Continue to provide the required full-day bias-free policing training and the quarterly roll call trainings.
- Implement the plan for improving training in bias-free policing and procedural justice.
- The Department will keep the MT and DOJ advised of progress and confer as appropriate on the training development process. For all training related to the SA, the Department will provide course materials for DOJ and the MT review and receive approval prior to implementation.
- Continue working with CPE to meet the objectives identified in their scope of work related to stops activities and community work. The Department will provide updates, analysis plans, and reports to the MT and DOJ for review and discussion.
- Provide documentation to the MT and DOJ showing how data are used to evaluate and inform practice and to respond to any identified disparities in enforcement when warranted.
- Implement the new internal dashboards for stops and train the Department's managers and supervisors in how to use the new dashboards.
- Provide the MT with any plans or documentation of efforts to identify and address any potential disparities in LASD enforcement in the AV.

¹⁸ [Final Report of the President's Task Force on 21st Century Policing \(usdoj.gov\)](https://www.usdoj.gov/oea/reports/2015-2016)

b. *The MT*

- Provide feedback on data-related activities, including analysis plans and data reports created internally by the Department, the new internal and external stops dashboards, and any work plans and reports created through the Department’s partnership with the Center for Policing Equity.
- Continue to provide feedback regarding the application of problem-oriented policing principles.

6. Bias-Free Policing Compliance Status Table

Table 2 provides the compliance status for each paragraph in the Bias-Free Policing section.

TABLE 2 BIAS-FREE POLICING COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
64	Members of the public receive equal protection of the law, without bias based on race, color, ethnicity, national origin, religion, gender, gender identity, disability, or sexual orientation, and in accordance with the rights secured or protected by the Constitution or laws of the United States. Deputies do not initiate stops or other field contacts because of an individual's actual or perceived immigration status.	Yes 05/15/17	Yes 01/1/24	Partial	No
	Notes: The MT stops and bias-free policing audit found the Department is in partial compliance with this provision. Previously and in the audit, the MT saw no indication of recurring or systematic violations of this provision in its informal case-by-case reviews or in its stops audit. However, full compliance assessment for this provision requires additional assessment beyond the audit, including quantitative and qualitative reviews of stops measured across all of the MT's work and in LASD's required disparity analyses in SA Paragraphs 68, 81–86, 120–123, and elsewhere. Also, the audit found the Department to be in compliance for not using immigration status as a reason to initiate stops. The delivery of the training is measured in SA Paragraphs 57, 70, and 71.				
65	Museum of Tolerance and other experts are consulted on prohibited conduct, bias-free policing, implicit bias, and stereotype threat.	NA	NA	Partial	No
	Notes: LASD has been working with CPE since March 2023 after the MT and DOJ agreed the Department could work with them instead of the Museum of Tolerance. The MT awaits documentation from LASD detailing the results of the consultation and possible changes/enhancements to the training. LASD is also working with other external organizations for training and consultation purposes, including CRI-TAC consultants and training experts.				
66	Effective communication and access to police services is provided to all AV members, including those with limited English proficiency (LEP).	Yes 04/08/18	Yes 08/16/18	Partial	No
	Notes: LASD implemented the SA-compliant LEP plan on April 8, 2018. MT ride-alongs, reviews of complaints, and discussions with community have found the Department in partial compliance pending a formal review.				
67	Bias-free policing and equal protection requirements are incorporated into the personnel performance evaluation process.	Yes 05/03/16	NA	No	No
	Notes: In previous semi-annual reports, the Department was found in partial compliance with this paragraph. However, the MT and Parties continue to discuss how LASD will use enforcement statistics for stops as a part of their performance evaluation process. LASD has indicated it may be more appropriate to address this provision in other types of reviews rather than the annual performance evaluations. The Parties and MT need to create a method for establishing an appropriate sample that the MT can use to assess compliance.				

TABLE 2 BIAS-FREE POLICING COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
68	All LASD-AV programs, initiatives, and activities are analyzed annually for disparities.	NA	NA	No	No
	Notes: The Department expects to work in partnership with the CPE to address the requirements of this provision.				
70	Bias-free policing training is provided.	NA	Yes 08/16/18	Yes 06/15/22	Yes 03/13/24
	Notes: The Department has been in compliance with the delivery of this training since June 15, 2022, for deputies assigned to the AV stations and for embedded deputies from specialized units. The outcome of this training is measured through the practice provisions of this section of the SA. Based on recent audits, case reviews, and training observations, the Department has made revisions and is currently reviewing the training and considering further revisions or replacement.				
71	Quarterly roll call briefings on preventing discriminatory policing are provided.	NA	Yes 02/01/19	Yes 01/01/24	No
	Notes: Approved briefings began February 1, 2019, but were not delivered consistently until 2023. Compliance for this is measured annually. The Department met the requirements for providing the approved trainings throughout 2023. Note, the Department has developed a draft plan to assess and potentially change this training in response to recent DOJ and MT case reviews and MT audits.				

D. Enforcement of Section 8 Compliance

In February of 2022, the Department was deemed to have achieved sustained compliance with the SA housing provisions. With that determination, absent evidence to the contrary the MT will no longer monitor SA Paragraphs 73–80 and Paragraph 164 as it pertains to housing-related training.¹⁹

Training for this section is monitored via SA Paragraphs 70 and 71. The Department reached compliance for Paragraph 70 in 2022 and for Paragraph 71 in this reporting period.

1. Housing Compliance Status Table

Table 3 provides the compliance status for each paragraph in the Housing section.

¹⁹ Pursuant to the DOJ and LASD approval of MT SA Paragraph 150 Recommendation re. Housing Paragraphs 73–80 and 164 v2-28-22.

TABLE 3						
ENFORCEMENT OF SECTION 8 COMPLIANCE STATUS						
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE				
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED	PARAGRAPH 150
73	New housing non-discrimination (HND) policy is implemented.	Yes 2/23/18	Yes 01/01/24	Yes 05/31/18	Yes 05/31/19	Yes 02/28/22
74	All current deputies acknowledge receipt and understanding of HND policy.	Yes 2/23/18	Yes 01/01/24	Yes 5/31/18	Yes 05/31/19	Yes 02/28/22
75	All newly assigned deputies acknowledge receipt and understanding of HND policy within 15 days.	Yes 2/23/18	Yes 01/01/24	Yes 5/31/18	Yes 09/14/20	Yes 02/28/22
76	Policies regarding the review of requests from a housing authority for deputy accompaniment are revised.	Yes 03/14/18	Yes 01/01/24	Yes 5/31/18	Yes 05/31/19	Yes 02/28/22
77	Accompaniment policy regarding LASD housing investigations is implemented.	Yes 03/14/18	Yes 01/01/24	Yes 05/15/18	Yes 05/31/19	Yes 02/28/22
78	Deputies document all voucher holder compliance checks using Stat Code 787.	Yes 03/14/18	Yes 01/01/24	Yes 05/31/18	Yes 05/31/19	Yes 02/28/22
	Notes: The Parties and MT agreed that if there was no indication that LASD participated in housing-related enforcement actions, including Section 8 compliance checks, they would be found in compliance with Paragraphs 78, 79, and 80. On this basis, the MT found the Department in compliance after review of several years of community input and Department documentation of stops, arrests, and other actions indicated no such actions occurred.					
79	Deputies document each independent investigation for fraud based on voucher holder compliance with the voucher holder contract using Stat Code 787.	Yes 03/14/18	Yes 01/01/24	Yes 5/31/18	Yes 5/31/19	Yes 02/28/22
80	Deputies document housing-related activity using Stat Code 787 and do not inquire into an individual's Section 8 status.	Yes 03/14/18	Yes 01/01/24	Yes 05/31/18	Yes 5/31/19	Yes 02/28/22

Table Notes:

- The MT submitted a memo dated February 28, 2022, subsequently approved by the Parties, invoking Paragraph 150 for Paragraphs 73–80.
- The SA-mandated training related to housing is monitored in the bias-free policing training (Paragraph 70, in compliance) and the quarterly roll call training, Preventing Discriminatory Policing Parts A–G (Paragraph 71, in compliance).

E. Data Collection and Analysis

The requirements of the Data Collection and Analysis section run parallel to the data-related activities required to meet compliance with several other SA sections, including Stops, Bias-Free Policing, Use of Force, and Accountability (see data discussions in those sections). The related activities that the Department focused on in this reporting period included the following.

- Continue work to modernize and standardize the data systems used to document and track stops, use of force, complaints, training, and other SA-related activities.
- Continue partnership with CPE, including work related to requirements in SA Paragraphs 82–85.
- Develop and implement stops data dashboards for public and internal use and a risk management data dashboard (POINT).
- Further develop application and discussion of data in CMF and RMF.

1. Progress on Data Collection and Analysis Provisions

- The Department remains in partial compliance with SA Paragraph 81.
- In this reporting period, the Department reached partial compliance with Paragraphs 82 and 84.
- The Department remains out of compliance for Paragraphs 83 and 85.

As described in the Stops and Bias-Free Policing sections, the Department made progress in each of its areas of focus for this section, including continuing work to modernize and improve the reliability of its data systems; continuing its partnership with CPE; maintaining its publicly available stops data dashboard; nearly completing development of its internal stops dashboards for use by station managers; implementing its risk management data dashboard (POINT), also for use by managers; and continued improvements to the CMF and RMF.

2. Successes and Obstacles

It is concerning that nine years into the monitoring period, the Department has yet to sufficiently address the important measures of constitutional and bias-free policing that are required to be regularly assessed in this and other SA sections. However, the Department is now applying more focus on the critical area of data collection and analysis and has shown genuine commitment to improving data systems, improving data access and useability for station managers, and setting the groundwork, at least, for these regular analyses and assessments. The Department has taken several concrete and important steps toward routinizing the use of data to inform their practices. As we have emphasized in most of our semi-annual reports, developing the essential management skills needed to refine data queries, interpret results, and apply the findings to practice will take time, as does creating a culture, supported by formalized processes and robust practices, where data-driven decision making is a prioritized and routine part of daily operations. The MT acknowledges the attention that is now being given to these needs and the progress made in the last year.

Next Steps

- LASD will continue the data analysis work through the CPE partnership and provide work plans and reports for MT and DOJ feedback and compliance assessment.
- LASD will continue each of the activities described above related to data collection, data analysis, and the use of data to inform practice as part of this and other SA sections.
- The MT will provide feedback and technical assistance as appropriate.

Data Collection and Analysis Compliance Status Table

Table 4 provides the compliance status for each paragraph in this section.

TABLE 4

DATA COLLECTION AND ANALYSIS COMPLIANCE STATUS

SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
81	LASD collects data related to bicycle stops, backseat detentions, probation and parole stops and searches, consent searches, and vehicle impoundments.	NA	NA	Partial	No
	Notes: LASD has been collecting the required data for several years and is in partial compliance pending completion of an ongoing formal assessment of the accuracy and thoroughness of the data collection.				
82	LASD conducts semi-annual analysis of various data documenting stops, searches, seizures, backseat detentions, arrests, vehicle impoundments, uses of force, civilian complaints, and Section 8 voucher compliance checks.	NA	NA	Partial	No
	Notes: LASD has taken various steps toward compliance with this provision, including improving processes for gathering the needed data, establishing methods for stations to readily access and review data, and building capacity and expertise for using the data to inform practice. They also continue to work with CPE to conduct stops and UOF data analysis. The MT will review analysis plans and reports, including ways in which the stations use the findings to inform practice, to assess whether they address SA Paragraphs 82–86.				
83	LASD’s semi-annual data analysis includes regressions, including appropriate controls, to determine whether law enforcement activity has a disparate impact on any racial or ethnic group.	NA	NA	No	No
84	From the analysis, LASD identifies any trends or issues that compromise constitutional policing and respond accordingly by, for instance, reviewing and revising as necessary policy, training, or practice.	NA	NA	Partial	No
	Notes: LASD has taken steps toward compliance with this provision. The AV stations have begun to demonstrate a capacity for taking corrective action when problematic trends have been identified in various ways such as the quarterly reports, MT or AAB audits, or other reviews. Compliance with this provision will require the formalized and regular use of various types of analysis, including advanced analysis when appropriate (see regressions in SA Paragraph 83), to identify issues and inform potential changes to policy, training, or practice.				
85	LASD’s analysis identifies any problematic trends among reporting districts or deputies and takes appropriate corrective action. LASD’s analysis is incorporated into routine operational decisions.	NA	NA	No	No
	Notes: To take steps toward compliance with this provision, the stations will need to routinize the analysis of data as described in Paragraphs 82 and 83 and to regularly use the results of those analyses to inform practice and, when necessary, to take corrective action.				

TABLE 4					
DATA COLLECTION AND ANALYSIS COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
86	LASD produces a semi-annual report summarizing the results of the analysis and steps taken to correct problems and build on successes. The report is publicly available in English and Spanish and posted on LASD's website.	NA	NA	No	No

F. Community Engagement

The current leadership of the AV stations has made meaningful progress in the area of community engagement by strengthening the role of the CACs, seeking and documenting community input on police practices, developing a broader range of community partnerships, emphasizing the importance of professional conduct on the part of all personnel, and personally modeling the behaviors they expect of their staff. As described below, the MT has heard comments from the community and noted evidence in our own observations that LASD is improving in their community outreach efforts. They are interacting with the community in more varied ways and have started tracking and monitoring community input and feedback. There has been progress noted in compliance status for several community engagement provisions where the Department has been found to be in compliance or sustained compliance (SA Paragraphs 87a, 87b, 87d, 91). The MT has found the current station leadership is demonstrating a commitment to the spirit of the SA as it relates to community engagement, and we expect that this will translate into even greater gains with the community over time.

1. Community Meetings

In addition to the SA-required quarterly town halls, LASD continued to hold Days of Dialogue meetings facilitated by the US Department of Justice Community Relations Service (CRS). In the previous reporting period, CRS and LASD held a meeting in each community to focus on discussing and listening to concerns about deputy cliques or gangs. In this reporting period, CSR facilitated follow-up meetings in Lancaster and Palmdale in March on that topic and others, with the goal of sharing the information that was gathered in the previous meeting²⁰ and hearing from community members regarding their experiences with and perceptions of LASD. Key themes shared in the sessions included the following.

- Community members indicated that there was a recognizable improvement in the leadership with the two-captain model and that the captains have been open to feedback and were not defensive. While some community members also shared this perception of line deputies (“Deputies more engaging, times have changed”) there were also concerns expressed that some of the line deputies have been slower or reticent to engage with the community in different ways.
- Community members also shared their perspective on what positive community engagement looks like, with suggestions such as more meetings with facilitated dialogue, deputies using their first names in introductions, and more interactions with youth.²¹
- Community members shared concerns that the stations were busy, as demonstrated by delayed response times to calls for service, and lamenting that deputies didn’t have time to interact in their communities (engage with youth, attend community events).

²⁰ Written materials were passed out in the meeting and also posted on LASD’s website.

²¹ For more information, see LASD’s transparency website.

In addition to participating in the joint CAC meeting described below, as well as having conducted several ride-a-longs with deputies to observe their interaction with community members, the MT attended the following community events.

a. Quartz Hill Library Meeting (February 27, 2024)

Chief Castellano held an open community meeting at the library at 5:00 p.m. Captains Fender, Bardon, and Cartmill attended the meeting. The meeting was well attended. The demographics of the attendees appear to have mirrored the community as a whole, and participants posed questions about crime and LASD responses to community concerns. There were also challenging questions from the community about deputy accountability, with positive comments expressed about the work of LASD in the AV, as well as critical comments received from the Cancel the Contract members present. Several community members voiced concerns regarding the December 2023 shooting where a woman who called LASD for service was killed in front of her 9-year-old daughter. Community members voiced concerns that the involved deputy was also responsible for a similar shooting of a Black man in his home several years ago, and they were concerned that Department would not hold the deputy accountable. The station leadership were limited in their ability to discuss the incident because of the ongoing investigation, but they did listen to the concerns of the community, stressed that they would be transparent as possible, and continued the discussion with concerns community members following the meeting.

b. Coffee With a Cop (February 29, 2024)

Captain Bardon and approximately nine deputies who work in the area were present to engage with 15 community members. There was no formal presentation, but informal discussions took place while participants enjoyed coffee and doughnuts. Conversations appeared to go well, and everyone seemed to enjoy it.

c. Coffee With a Cop (April 30, 2024)

The meeting was held at a new Starbucks location in Lancaster. Approximately six to seven deputies were present throughout the event and about eight to 15 community members. An LASD resource table provided crime prevention information and flyers that explain how to make a complaint (English and Spanish versions) as well as the "Why'd You Stop Me" flyer (see SA Paragraph 52). There were several youth present who were interacting with the deputies. All the youth appeared to be very supportive of LASD. There was no formal agenda, just deputies and community members engaging with each other.

d. Some Additional Noteworthy Upcoming Community Events

- Organization of a march for peace to be held in July 2024.
- Participation in Faith & Blue weekend, October 11–14, 2024, with four days of locally organized community–officer engagement activities as part of the national collaborative policing initiative.
- "Tip a Cop," where station personnel work at a local restaurant, raising tip money to be donated to the Special Olympics.

2. Deputy Community Engagement

- The Department is in sustained compliance for establishing the mechanisms for deputy participation in community engagement efforts (SA Paragraph 87a).
- The Department continues to be in compliance for sworn personnel involvement in community engagement activities (a component of SA Paragraph 88).

In 2021, LASD established an attendance plan and related processes for ensuring deputies have opportunities for meaningful interaction with community members and that deputy participation is documented. These processes have been maintained and improved since then, thus the Monitors now find the Department in sustained compliance for SA Paragraph 97a.

Quantitative compliance with the requirement that deputies participate in community engagement events is monitored in SA Paragraph 88 and is measured via deputy attendance and engagement in community events and meetings over the course of the calendar year. In addition to participation at events, deputies can self-initiate positive engagement with community members (which deputies log with code 755); however, both stations have decided to no longer document 755s. Therefore, compliance with this component of Paragraph 88 is solely based on sworn staff member attendance at events. To be in compliance, 95% of each station's available sworn staff need to attend at least three approved events per year.

To document deputy attendance at events, LASD maintains a community engagement tracker that lists how many events were attended for the year by each sworn staff member. LASD submitted the 2023 tracker to the MT for compliance review. The MT randomly selected staff from each station and requested back-up documentation for those staff. The documentation included descriptions of each event and a roster of which staff attended.

The MT found that in Palmdale, 213 of 214 sworn staff were found to be in compliance, for a station compliance rate of 99%. For the Lancaster Station, 171 out of the 174 Station personnel were in compliance, for an overall 98% compliance rate. The MT reviewed the nature of the events attended and found they meet SA expectations for providing opportunity for deputy interactions with AV community members. Through observations and community feedback, the MT will continue to monitor the *quality* of deputy interaction with community members at these events.

3. Efforts to Expand Outreach and Enhance Relationships With Diverse Groups

- Progress is evident, but the Department remains in partial compliance for enhancing relationships with particular groups, including youth and communities of color (a component of SA Paragraph 88).

In this reporting period, the AV stations have continued to put increased effort into broadening their outreach and connections to all groups within the AV community. The MT finds the Department is on track to reach compliance with the provisions Within Paragraph 88 and other SA paragraphs related to

building trust and developing collaborative partnerships with the diverse AV community. Some activities in this reporting period included the following.

- The AV stations have organized a coalition of community-based organizations and government agencies to promote collaborative partnerships. The Antelope Valley Community Coalition has met twice, with another meeting planned for July, which Sheriff Luna is scheduled to attend.
- Both stations have been dealing with an increase in retail thefts driven by roving crime groups. The stations are now working closely with the business community and specific establishments to address these concerns through a combination of enforcement and crime prevention measures that are tailored to the targeted businesses.
- The Lancaster captains have been working with local schools to conduct outreach and host events with educators and students and their families with the aim of gaining greater understanding of and properly responding to their needs and concerns.
- The AV stations have increased efforts to build bridges with groups that have been vocal in their critiques of the Department, as exemplified by Lancaster operations captain meeting twice with representatives of the local Cancel the Contract group.
- Lancaster station leadership is working to coordinate their efforts with another new partner, the newly constituted Lancaster Police Department (LPD). The newly created agency has three sworn personnel and focuses its efforts on addressing quality-of-life issues in the Lancaster community. An initial objective for the city is to have the new police department staff respond to certain low-risk, non-enforcement calls, thereby freeing LASD deputies for other activities. LASD is also utilizing the city's system of surveillance cameras (see CMF discussion below).
- LASD will be piloting a community engagement strategy in the AV called Game Changers, which includes discussion groups, the sharing of a meal, and often an activity such as a sporting event to help overcome barriers that may exist between law enforcement and community members by creating opportunities to develop and foster ongoing individual relationships. Game Changers is a grant-funded outreach strategy that has also been implemented in Central Los Angeles and is modeled after similar endeavors that have been successful in a wide array of communities, and which has been shown to be essential for successful community policing practices to flourish.

4. Community Advisory Committees

- The Department is in partial compliance for including youth on the CACs or some other advisory group (a component of SA Paragraph 94).
- LASD is in partial compliance with the CAC requirement that "membership is representative of the diverse communities in the Antelope Valley, including members from each station, faith communities, minority, ethnic, and other community organizations" (a component of SA Paragraph 94).
- Regarding various provisions related to facilitation of the CACs, LASD is in compliance with SA Paragraph 93 and in sustained compliance with SA Paragraphs 87c, 96, and 97.

a. CAC Membership

The station captains and their Community Relations personnel and Compliance Unit staff are putting strong efforts into expanding the membership of their CACs. Palmdale's CAC has seven current members. Four members recently left the committee, but new applications were being reviewed in June. Lancaster's membership has also dropped, and new members are being sought to replace the four members who were asked to resign due to very low participation and non-attendance at recent meetings. The MT acknowledges that the stations have made a significant effort to invest in recruiting new and diverse CAC members who hold a variety of viewpoints on law enforcement and community relationships. The efforts by the AV stations with regard to growing and sustaining a diverse CAC membership have the Department on track toward compliance in this area in the next reporting period.

There are currently two youth on each CAC. Lancaster Station has also established a Youth Civilian Advisory Council with more than 10 youths representing a cross-section of the AV, with support being provided here by Future Leaders California (futureleaderscalifornia.org). Meeting and sustaining the SA requirements for youth participation has been difficult, so these are impressive developments that the MT will continue to monitor in the next reporting period. If youth are found to continue their active involvement in the CAC or the separate youth council, the Monitors expect the Department to reach compliance with this provision in the next reporting period.

b. MT Meeting With CAC Members

The MT hosted a joint session of the CACs from Lancaster and Palmdale on April 30, 2024. Six CAC members were present, three from each station, plus a former Palmdale CAC member who serves as an advisor with a particular focus on building youth engagement. The Lancaster captain and a few other station personnel also attended. The captain engaged without defensiveness, genuinely listening to concerns and responding openly and honestly to questions.

As many members of the CAC are relatively new, they are not yet well-oriented to the SA requirements regarding the CAC. The MT reviewed the SA-related CAC roles and responsibilities. In particular, the MT discussed SA Paragraph 93 subsections a–d, which describe four specific roles of the CAC, including: (1) advise the Sheriff and station commanders on ways to improve community relations, bias-free policing, and access to the civilian complaint system; (2) work with the Department to establish and carry out community public safety priorities; (3) provide the community with information about the monitoring; and (4) share with LASD public comments and concerns with the Department.²² The CAC members

²² Full text SA Paragraph 93: *LASD will continue to support Lancaster and Palmdale's CACs to advise and provide feedback to the LASD's Antelope Valley stations. The panel will leverage the insights and expertise of the community to address policing concerns, including, but not limited to, racial or ethnic profiling and access to law enforcement services, and promote greater transparency and public understanding of LASD. The civilian panel shall be authorized*

generally agreed that these four mandates were not being met sufficiently thus far. However, the CACs did seem to be doing a better job of bringing community concerns and complaints to the stations. For example, at the meeting, several CAC members voiced concerns that the complaints system is not working adequately and that AV residents do not know where to get a complaint form or how to submit a complaint. CAC members also mentioned that they see patterns where certain groups, especially youth of color, are disproportionately and/or repeatedly being stopped by deputies.

The CAC members have demonstrated increasing comfort and willingness to share perspectives and concerns with the Department in productive ways that help LASD better address the issues. For example, a couple of CAC members described separate instances where they personally overheard deputies make comments they perceived as racially biased. While these comments are no doubt concerning, the fact that the CAC members felt comfortable bringing them up and the station personnel genuinely listened is a step in the right direction. In the previous administration, the most ardent critics of the sheriff's department were asked to leave or departed the CAC on their own. The MT was pleased to notice that these current CAC members were comfortable providing both praise and criticism of the department and that healthy discussions followed. CAC members expressed that they were aware that training cannot always change a deputy's personal opinions but that it was the role of Department leadership to provide messaging that such views are not tolerated while on the job.

While there is still much progress to be made, the addition of new CAC members and the willingness of CAC members to critique and even challenge the Department are positive developments.

5. Community Engagement Training

- LASD is not in compliance with providing deputies with the extensive community engagement training required by SA Paragraph 89.

LASD reported that the community engagement training that was reviewed by the MT and DOJ in 2020 has been revised and has been shared with CRI-TAC for input. The MT appreciated that LASD has taken the initiative to get additional recommendations from external experts and serves as evidence that LASD is showing more openness to constructive criticism than in the past. Training is integral to the successful adoption of community policing and problem-solving policing practices at the stations and will greatly boost the stations' capacity for productive community engagement. We recommend that LASD prioritize training development and send the draft curriculum to the MT and DOJ for review and feedback.

In the meantime, LASD is piloting an eight-hour training called "Why'd You Stop Me" (WYSM). WYSM has not been submitted to the MT and DOJ as a training tool that could be used toward compliance

to: (a) advise the Sheriff and the station commanders on strategies and training to improve community relations, bias-free policing, and access to the civilian complaint system; (b) work with the Sheriff and station commanders to establish and carry out community public safety priorities; (c) provide the community with information on the Agreement and its implementation; and (d) receive and convey to LASD public comments and concerns.

with Paragraph 89, but the MT and DOJ have observed the training. The MT finds value in the training and encourages the department to continue its pilot. We described some of the strengths of the course in the Stops section above; it also has elements that touch on the Community Engagement section. Importantly, WYSM underscores a point that has been made in previous reports: stops are the largest community engagement activity that deputies engage in, and they do have a lasting impact on community perceptions. The WYSM training includes curriculum on procedural justice, deputy wellness, and the long-term impact that negative interactions with law enforcement officers can have on community members. The trainers include former law enforcement officers and community members who each share their personal experiences to reinforce 21st-century policing practices. The trainers are experienced and knowledgeable and kept the deputies in attendance at a high level of engagement and responded well to questions.

6. Community Engagement Reports

- LASD is in sustained compliance for producing annual Community Engagement Reports (SA Paragraph 91).

In this reporting period, the Compliance Unit and AV stations produced their 2023 Community Engagement Reports, which were found to be in compliance by the MT and DOJ. While we expect continued improvement, LASD been in compliance with this provision since our December 2022 report and is now in sustained compliance. Sustained compliance will be maintained as long as the reports continue to improve their assessment of successes and obstacles to community trust and engagement and, in particular, their application of problem-solving processes to community concerns and input.

The reports used a new format this year featuring a more readable and visually appealing layout and more concise text. The reports contained examples of the engagement events and meetings held over the year, new partnerships formed, and efforts made to improve the way the stations document and respond to community input about crime concerns and other issues. As in the last several years, the MT and DOJ encouraged the stations to continue to improve upon the reports' discussions of "successes, obstacles, and recommendations for future improvement" (SA Paragraph 91) and to elaborate on the ways the Department is addressing community input on law enforcement concerns and priorities. The public is encouraged to view the reports at the Department's website.²³

7. Diversion

- The Department is in sustained compliance for working with the community to develop diversion programs (SA Paragraph 87d).

SA Paragraph 87 includes a component that requires LASD to actively engage in the development of a diversion program for AV youth. As noted in previous reports, LASD has found the Department in compliance with the diversion program provision through the review of LASD documentation, direct

²³ [Lancaster Station | Los Angeles County Sheriff's Department \(lasd.org\)](https://www.lasd.org)

observation, and discussion with community members since 2021. LASD has maintained compliance in this area for several reporting periods and is now deemed by the Monitors to be in sustained compliance.

8. Crime Management Forum and Risk Management Forum

- The Department remains in partial compliance with Paragraph 90 regarding CMF meetings.
- The Department remains in partial compliance with Paragraph 90 regarding the RMF.²⁴

The Department remains in partial compliance for the CMF and RMF meetings despite important improvements that are underway. The MT has provided LASD with ongoing feedback on the CMF process since the start of monitoring period. We have seen the most improvement having been made in the last two reporting periods. The CMF is an important element of the Department's crime suppression, crime prevention, and accountability processes. The meetings provide opportunities for division executives to track and assess station operations and trends and to give station leadership direction regarding Department priorities and expectations. It also allows station captains to share new approaches and lessons learned that may be applicable to other stations.

a. Systematic Review and Creation of a CMF/RMF Integration Guidebook

In the fall of 2023, the OCP advised the MT they were beginning a significant redesign of the CMF and RMF meeting processes. The last CMF that followed the old format was conducted on October 23, 2023. The Department deferred some of the CMF meetings as modifications to the process were developed and formalized. Since October 2023, two CMF meetings have been held, in January and March of 2024, with the division managers and station leadership gradually integrating the new format into the meetings. There was also a RMF review held in June of 2024. Among other changes, the new process is designed to devote more attention to risk management issues, more robust discussions of community input into LASD-AV crime prevention strategies, and additional time being devoted to discussing efforts taken by the AV stations to conduct trend analyses related to both crime and risk management issues. The intent is to incorporate risk management considerations into the CMF, and ultimately to combine the CMF and RMF into a single process to achieve greater efficiencies in management reviews and devote sufficient ongoing attention to both areas.

As part of the redesign, the Department has drafted a guide titled "CMF/RMF Integration Guidebook" meant to provide direction and key considerations for staff as they conduct operations through the year and prepare for their monthly presentations. The guidebook organizes the process into the following chapters: Crime, Problem-Oriented Policing, and Enforcement; Community Partnerships; Systematic Prevention Efforts; Accountability; Employee and Workplace Wellness; and Assessment. The MT has not conducted a full review of the "CMF/RMF Integration Guidebook" but will when the Department

²⁴ The topics addressed in the CMF and RMF touch on aspects of each SA section, but are listed in the SA and addressed in this report under Community Engagement.

determines the material is ready for review. In the meantime, the MT and DOJ will continue to provide feedback on the meetings.

b. *Positive Developments in CMF/RMF*

The following are examples of the positive developments the MT has observed in the CMF/RMF meetings conducted in this reporting period.

- Use of technologies to support crime reduction efforts: The CMF has included increased discussion regarding the use of license plate reader cameras to identify stolen vehicles and arrest the drivers of the vehicles. "Flock" surveillance cameras are also being used to aid in investigations associated with increased retail theft and other crimes and to monitor hot spots. These cameras provide additional means to capture the movement of vehicles that have been involved in violent crimes and property crimes and have proven to be of help in the identification and apprehension of the suspects involved. The cameras were procured by the City of Lancaster; thus, the use of this technology is the result of LASD partnering with key stakeholders to address crime more effectively.
- Emphasis on crime reduction: During CMF meetings, AV station captains are now emphasizing that the measure of success they are stressing is the goal of actually reducing crime rather than basing success on the total number of arrests being made. This is a positive change in perspective that shifts the attention of their personnel to what the ultimate goal and outcome should be (the elimination or prevention of crime) rather than concentrating their attention only on conducting a narrow activity that may or may not result in a reduction in crime.
- Office of Constitutional Policing: The OCP was instrumental in creating the "CMF/RMF Integration Guidebook" and regularly attends the CMF meetings to provide input. This provides an important perspective for accountability and can provide valuable input to staff as they work to address crime.

c. *Areas for Continued Improvement in CMF/RMF*

The following are aspects of the CMF meetings that the MT has found are improving but which require ongoing attention.

- Community partnerships and community input: During the CMFs, there has been an increased interest in inquiring about community interaction and what is being done to strengthen partnerships that will help to address crime and social disorder. This is a positive development, but the MT finds it difficult to reach an adequate understanding of the extent or effectiveness of these efforts because of the very limited attention and time devoted to this topic. Efforts to incorporate community input and other community policing and problem-oriented policing practices should continue to be expanded in the presentations and be documented thoroughly in written crime plans. The Monitors will be looking for evidence and documentation of community collaboration efforts that serve to identify the public's crime reduction and policing

priorities and efforts to partner with the community as meaningful co-producers of public safety. This is encouraging, especially as the stations also report progress in their efforts to expand collaborative partnerships with community groups and other governmental agencies.

- Problem-oriented policing (POP): Station leadership continues to increase the regularity and sophistication of their application of problem-solving principles to their higher priority public safety and law enforcement issues, such as traffic accidents, retail theft, and call for service response times.²⁵ Station commanders have occasionally reported they have applied the SARA model in these problem-solving activities. The MT was also informed that LASD is creating a template for problem-solving presentations. The MT looks forward to reviewing the template and hastening its path to implementation. These efforts should continue to expand, including increased reporting and tracking of community input, more regular collaboration with community partners, and regular use of SARA, including following up on previously presented topics to discuss progress and lessons learned.
- Accountability: More effort is being devoted to monitoring and assessing deputy performance and conduct by way of reviews of station enforcement activity, uses of force and complaints related to those activities, particularly so in the RMF reviews. This is a good management practice and is an issue that LASD has consistently reviewed over the years. With regard to the CMF meetings, LASD personnel who perform the criminal investigations occasionally provide brief updates related to some of their efforts that are directly associated with patrol priorities, but there is no discussion or attention routinely devoted to performance goals and outcomes associated with those particular operations—such as providing documentation and discussion regarding clearance rates, the timeliness of investigations, cases charged by the DA, and other investigative efforts. Doing so could promote more awareness of the importance of accountability for results, not only in patrol operations but in the investigative units as well and

²⁵ For example, In the January 2024 meeting, both AV stations discussed their traffic enforcement efforts as a part of the Antelope Valley Traffic Task Force's efforts to increase traffic safety. Lancaster station leadership focused the presentation on efforts underway to reduce the number of fatal and injury traffic collisions, providing a listing of traffic collision-related data, including those involving deputies, and a mapping of the collision locations as well as a discussion of activities including engagement with other regional law enforcement resources to increase traffic enforcement, use of social media, and utilizing more technology (e.g., traffic cameras). Finally, there was a discussion of employee wellness and strategies to address fatigue related to the amount of forced overtime at the station. The Palmdale operations captain discussed their efforts to reduce traffic collisions through the application of the SARA problem-solving process. The station captain pointed out that staff are focused on providing more targeted traffic enforcement across the City of Palmdale based on statistical data related to collisions. The station captains also reported emphasizing to the deputies how important it is to treat people with dignity and apply the procedural justice concepts and training they have been provided during the stops they conduct. The March 2024 CMF meeting was the first for the new NPD chief, who assumed command of the division in February 2024. The Palmdale operations captain provided data and information highlighting a significant increase in retail thefts. The top five theft locations were identified for enhanced attention, which involves such things as the application of applying crime prevention through environmental design (CPTED) techniques along with increased surveillance and enforcement tactics focused on repeat offenders.

help inform the community about the performance and effectiveness of the staff who work in this essential unit. It would also provide an opportunity to identify gaps and discuss areas where more improvement can be made.

- Role of NPD management in the CMF and RMF: NPD managers have improved their level of participation in the CMF meetings, including more regularly asking pertinent follow-up questions and giving guidance and instructions to station commanders. NPD managers should continue to expand the depth of their questions. As we emphasized in the last semi-annual report, managers must be willing to routinely engage staff through the use of thoughtful and probing questions about their practices and discuss root causes of the issues, the reasonings behind the law enforcement response(s) selected or managerial actions taken, and the ongoing assessment of results to determine whether modifications or refinements are required.

Also, stations need to proactively and regularly identify practices that have a negative impact on the community and to implement steps to mitigate or eliminate ineffective or problematic tactics and activity. NPD managers should place greater emphasis on routinely scrutinizing policing tactics so as to ensure the intended outcomes are being achieved and the potential for creating unintended consequences is minimized.

9. Successes and Obstacles

In our observations of the OCP's strategic efforts and the extensive community engagement efforts of the AV stations' leadership, the MT notes that community engagement efforts appear to be headed in the right direction. LASD is implementing several new approaches to community events and in the process of developing new partnerships, adding additional CAC members, and piloting a community input tracking process. The MT supports these efforts and will continue to assess the success of these initiatives over the next reporting period.

However, the lack of progress in the following areas may significantly hinder or delay continued progress toward compliance in community engagement and other areas of the SA, including stops, bias-free policing, CMF/RMF, and accountability, so we urge more attention be devoted to these items.

- Crime Prevention Strategies/Crime Reduction Plans: The MT has observed topics discussed during the CMFs that would be considered important components of a comprehensive crime reduction plan and that have included problem-solving tactics and techniques, but the LASD-AV stations have not yet completed their crime reduction plans. Those plans will serve as a means of ensuring line staff understand what the station's crime reduction priorities are, what their leaders expect of them, and what the key initiatives and tactics are that will be utilized to achieve the goals of the plan. Additionally, the plans will provide North Patrol Division leadership with baselines against which to measure progress, craft probative questions for AV station captains, assess the station's efforts, and hold staff accountable for results. Once the plans are completed, LASD can more fully implement the principles and guidelines in the new CMF/RMF guidebook. An articulated crime reduction plan will also help the MT provide relevant and specific TA to assist the department in reaching compliance with the SA.

- Community Engagement Training. The MT has been informed that the SA Paragraph 89 community engagement training is under development. The training is integral to the successful adoption of community policing and problem-solving policing practices at the stations and will greatly boost the stations' capacity for productive community engagement. We recommend LASD prioritize training development and send the draft materials to the MT and US DOJ for review and feedback.
- Continued Revisions to CMF and RMF and related processes. As discussed above, the Department seeks to revise and improve the format and content of the CMF, including the incorporation of risk management considerations, while simultaneously working to develop and/or improve various related functions that will be needed to meet CMF and RMF goals, such as more timely and reliable data on risk management issues, the use of the new internal dashboards, the PMP reboot, and the development, approval, and implementation of various policies and training. The MT supports this approach and looks forward to providing TA and feedback.

10. Next Steps

a. *LASD*

- Continue to hold and expand community engagement events and outreach.
- Ensure that ongoing meaningful engagement with the community remains a priority and that timely follow-up occurs in the wake of critical incidents or other matters of community concern.
- Ensure that there is broad representation and participation in the CAC membership and continue to strive to engage with hard-to-reach or historically critical groups.
- Improve processes to track community input, including the nature and source of the comments, collaboration with community members toward solutions, actions taken by the Department and/or community members, outcomes, and information learned through feedback loops about the process.
- Incorporate feedback from CRI-TAC and submit the training required in SA Paragraph 89 for MT and DOJ review.
- Continue to hold CMF and RMF meetings and continue developing the improvements described in this and the Accountability section. Ensure that the RMF trend analysis addresses the concerns in the Monitors' memo pertaining to Paragraph 90 compliance.
- Use the results of the fourth Community Survey to inform law enforcement and community engagement activities.
- Conduct further work to develop an alternative community survey and a deputy survey.

b. *The MT*

- Continue to observe and provide feedback on LASD community engagement activities and the CACs.

- Continue to actively engage with the CACs and community to better understand their concerns, perceptions, and expectations related to the progress in achieving the outcomes intended by the SA.
- Provide the finalized Community Survey data to the community and LASD, and work with the Department on ways these data can be used to inform practice.
- Review any submitted documentation such as CPE work plans and reports, the 2023 Community Engagement Report, a new Deputy Survey methodology and instrument, a new Community Survey methodology and instrument, and community engagement training.
- Continue to observe and provide feedback on the CMF and RMF.
- Assess progress with the diversion program.

11. Community Engagement Compliance Status Table

Table 5 provides the compliance status for each paragraph in the Community Engagement section.

TABLE 5

COMMUNITY ENGAGEMENT COMPLIANCE STATUS

SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
69 (in Bias-Free section)	Annual organizational culture and climate study, including using experts and the Community Survey to study organizational climate and culture in the AV stations to aid in developing the requirements in the section. Personnel will be allowed to confidentially provide information for the study.	NA	NA	Partial	No
	Notes: The Community Survey has been administered four times (the fourth report was released in this reporting period), but the Department has not informed the MT or provided documentation of how it uses the survey results to inform community engagement activities (see Paragraph 88). The Deputy Survey has been administered twice. LASD has reported it intends to revamp the Deputy Survey to make it more useful. MT will review their proposed changes when submitted.				
72 (in Bias-Free section)	LASD agrees to use experts and a survey to study organizational climate and culture in the AV stations to aid in developing bias-free policing training requirements.	NA	NA	Partial	No
	Notes: See Paragraph 69.				
87a	Actively participate in community engagement efforts, including community meetings.	Yes 12/11/19	NA	Yes 09/21	Yes
	Notes: The mechanisms for deputy participation in community engagement efforts have been in place since 2021; the extent and quality of that participation are measured in Paragraph 88.				
87b	Be available for community feedback.	Yes 12/11/19	Partial	Yes 06/24	No
	Notes: As described in this section, the MT has observed indications that Department managers now make themselves available to all feedback and that stations are implementing a tracking system to review community concerns. The eventual community engagement training (Paragraph 89) will address productive Department–community interactions.				
87c	Develop CACs.	Yes 12/11/19	NA	Yes 06/16	Yes
	Notes: The CACs existed before the SA but were implemented in accordance with the SA in 2016 and have been maintained ever since.				
87d	Work with the community to develop diversion programs.	Yes 12/11/19	NA	Yes 09/21	Yes
	Notes: Since 2021, the MT has found the Department in compliance with the diversion program provision through the review of LASD documentation, direct observation, and discussion with community members.				

TABLE 5

COMMUNITY ENGAGEMENT COMPLIANCE STATUS

SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
88	Ensure all sworn personnel attend community meetings and events, and take into account the need to enhance relationships with particular groups within the community including, but not limited to, youth and communities of color.	Yes 1/10/19	Partial	Partial	No
	<p>Notes:</p> <ul style="list-style-type: none"> LASD published an approved Attendance Work Plan (January 10, 2019; revised April 1, 2020). In compliance for deputy participation in community events and/or independent engagement with community members for 2023. In partial compliance with the qualitative requirements to account for the need to enhance relationships with particular groups. Much progress was made in this reporting period toward increasing the extent and quality of the AV stations' engagement with the community. If the AV stations continue their recent efforts in the upcoming reporting period, including making focused efforts to engage with certain groups, such as youth and communities of color, the Monitors expect to see further evidence of enhanced relationships with those groups (as indicated through information received from the CACs, other community groups and individuals, or community surveys) and that compliance with this aspect of Paragraph 88 will be achieved. Not in compliance with using the annual Community Survey to inform changes to the attendance plan, if needed. 				
89	In-service training on community policing and problem-oriented policing is provided to all AV personnel.	NA	No	No	No
	<p>Notes: The Department continues to work on the full-day training. After full implementation of the training, outcomes related to each aspect of the community engagement training will be measured in other provisions.</p>				
90	Revise content of CMF and RMF to include discussion and analysis of trends in misconduct complaints and community priorities to identify areas of concern, and to better develop interventions to address them using techniques to better support and measure community and problem-solving policing efforts.	NA	NA	Partial	No
	<p>Notes: The MT observes every RMF and CMF and found that the meetings are reflecting progress with the usage of data, examination of trends, probing of responses, and expectations for follow-up to be conducted; however, more attention must be devoted to problem solving efforts and engaging with the community for the purpose of identifying and responding to their public safety priorities.</p>				
91	Complete annual reports on the impact of community engagement efforts, identifying successes, obstacles, and recommendations for future improvement in order to continually improve LASD–community partnerships.	NA	NA	Yes	Yes

TABLE 5

COMMUNITY ENGAGEMENT COMPLIANCE STATUS

SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
	Notes: The MT and DOJ provided feedback on drafts of the 2023 LASD Community Engagement Report and determined it to be in compliance while recommending areas for continued improvement. LASD is in sustained compliance on this item, and the monitoring team expects that this report will continue to improve as the stations begin to track community events				
92	Seek community assistance in disseminating SA.	NA	NA	Yes	Yes
93	Support and work with CACs to help them meet their mission to leverage the insights and expertise of the community to address policing concerns, including, but not limited to, racial or ethnic profiling and access to law enforcement services, and to promote greater transparency and public understanding of LASD.	Yes 9/27/14 2/11/15	NA	Yes	No
	Notes: The Department continues to support and work with the CACs but must make improvements to remain in compliance and to ensure the CACs effectively function in the manner envisioned by the SA. Particular emphasis needs to be placed on the number and representativeness of CAC members, meeting attendance, and documentation and follow-up on community input.				
94	Memorialize CACs and facilitate quarterly meetings.	Yes 02/11/15	NA	Partial	No
	Notes: If the AV stations establish and maintain sufficient CAC membership, and if they maintain youth representation and active participation on the CACs and/or in the new separate advisory group, the Monitors expect the Department to reach compliance with this provision in the next reporting period.				
95	Post CAC reports on LASD-AV website and respond to recommendations.	NA	NA	Yes	No
	Notes: The Department now regularly posts CAC reports and its response to recommendations made in those reports on its website. In the next reporting period, the parties will discuss what will be necessary to maintain compliance and to reach sustained compliance.				
96	Provide administrative support and meeting space for CACs.	Yes	NA	Yes	Yes
97	Ensure CACs have no access to non-public information.	Yes	NA	Yes	Yes
98	Assist the Monitors in annual Community Survey.	NA	NA	Yes	Yes
	Notes: See Paragraph 69.				
99	Cooperate with independent researcher in conducting annual Community Survey and Deputy Survey.	NA	NA	Yes	Yes
100	Cooperate with administration of the annual Community Survey.	NA	NA	Yes	Yes
101	Post annual Community Survey report on LASD-AV website.	NA	NA	Yes	Yes

G. Use of Force

The UOF-related tasks that LASD chose to prioritize in this reporting period were:

- SA-compliant UOF and conducted energy weapons (CEW)/Taser policies;
- SA-compliant UOF training;
- UOF data analysis;
- Response to MT UOF audit; and,
- Continued managerial review of uses of force (EFRCs, CIRPs, etc.).

1. SA-Compliant UOF and CEW/Taser Policies

We are pleased to report that the Department is in compliance with its UOF and CEW/Taser policies.

- The parties and MT have approved the UOF policy and conditionally approved the conducted energy weapons (CEW, aka Taser) policy. These policies have also undergone review and approval by the LA County Civilian Oversight Commission, the LA County Office of the Inspector General, and LASD labor representatives.
- Regarding the CEW policy, approval by the DOJ is contingent on: (1) for a period of one year after implementing the CEW policy, the Lancaster and Palmdale stations will provide on a monthly basis the Taser logs for incidents involving more than three cycles or more than 15 seconds of CEW application; and (2) LASD agrees to renegotiate the policy paragraph regarding repeated CEW exposure if LASD personnel are using Tasers in ways that are dangerous or inappropriate.

Prior to Sheriff's Luna's election, the Department lacked a sense of urgency in meeting the agreed upon terms and conditions of the Settlement Agreement, which was a disservice to LASD deputies and the communities they serve. For more than five years, the Parties and MT have engaged in intensive discussions regarding the UOF policy, with the MT and DOJ having put significant effort into documenting our concerns in reports, memorandums, correspondence, and our semi-annual reports. That work came to a standstill in the previous administration. More recently, as a result of the leadership provided by Sheriff Luna and the Office of Constitutional Policing, there has been a significant and welcome shift in LASD's responsiveness and collaboration in the development of these policies that has resulted in impressive progress on this front. In June 2024, the Parties and MT reached agreement on the revisions to the UOF and CEW/Taser policies, and soon after, OCP announced agreement with the deputy labor unions as well. Under the Sheriff's continued leadership, we expect that LASD will continue improving upon its use of force training, the thoroughness of the investigations, and providing essential supervision that meets the requirements established by the SA. The MT acknowledges the months of hard work the OCP and ALADS engaged in to reach agreement on the MT and DOJ approved policies; we look forward to implementation.

2. Use-of-Force Training

- The Department remains out of compliance with its UOF training (SA Paragraphs 119a–e).

As the UOF policies are implemented, LASD will need to update and monitor its UOF training to ensure it remains consistent with policy and meets expectations of both policy and the SA.

As noted in previous six-month reports, LASD brought in a highly regarded training expert to oversee training related to the SA as a member of OCP. Through this reporting period, this expert continued to take an active leadership role in the oversight of LASD's use-of-force training and collaborated and regularly met with MT members to discuss the development of LASD training goals and requirements.

During this reporting period, the Department continued making progress regarding their training objectives. The Department recently made some important changes to the leadership of the Training Bureau, namely assigning two captains to jointly lead the bureau: one focuses on training of recruits in the academy and the other oversees advanced officer training. LASD is revising its Supervisors Use-of-Force Training Course and engaging external training resources and expertise via the Collaborative Reform Initiative Technical Assistance Center (CRI-TAC) Team, which is provided through funding by the US DOJ COPS Office.

The Department implemented updated defensive tactics training focusing on ground control restraint tactics. This is being provided Department-wide by qualified subject matter experts. The MT will observe the course during the next reporting period and provide feedback, as needed. If aspects of it are determined to be SA relevant, we will work with the Department to do a formal compliance review at that time.

LASD will be equipping deputies with a new Taser model in the upcoming reporting period. At the end of the present reporting period, LASD submitted training documents for the Taser 10, and the MT and DOJ are now reviewing it. We will observe a pilot training for this model in July and will provide an update on our assessment in the next reporting period.

3. Management Use-of-Force Data Analysis and Reviews

In another positive development, the recently appointed North Patrol Division (NPD) chief has implemented additional management accountability measures intended to ensure the prompt review and assessment of Category 2 use-of-force incidents and regular review of patterns and trends in the use of force.

North Patrol Division staff now lead weekly meetings attended by all NPD captains in which station operations staff, watch commanders and/or field sergeants present all Category 2 UOFs that occurred in the week prior. The purpose of this process is to ensure a timely initial assessment is conducted of those uses of force and any concerning issues quickly identified and addressed. Topics discussed include, but are not limited to, a review of deputies' actions, policy and training considerations, as well as risk management concerns. To ensure they are addressed, all concerns identified in these meetings

are tracked throughout the investigation and adjudication. If significant concerns are identified during the UOF review, division command staff can deem the UOF package as a priority for a quicker turnaround. This ensures timeliness should an administrative investigation (AI) be needed to address policy violations. The Monitors wholly support this weekly focus on Category 2 uses of force as these typically represent a large proportion of force cases. MT staff have begun attending the weekly meetings; we will report on their progress in our next semi-annual report.

The Department is also in the process of implementing a new data dashboard, referred to as the POINT system, to provide up-to-date information to unit commanders regarding deputies' performance, UOF data trends, policy and training considerations, and risk management considerations. It can be utilized to identify evolving issues and patterns regarding UOF incidents and can automatically alert managers to concerning trends. The force and complaints aspects of the system provide metrics on the status of all UOF and complaint cases and can be used to ensure internal reviews are conducted promptly. Once trends are identified, corrective action plans will be developed to address the concerns. The Department continues to refine the system and has identified and is working to eliminate a few concerns that have arisen regarding the data available for the dashboard, which does not provide sufficient differentiation of the involvement and adjudication of individual deputies in incidents involving multiple deputies. The dashboard represents an important step forward in supervisors and managers making routine use of data at the AV stations and the establishment of an early intervention system, which previously had been difficult to extract from antiquated Department data systems.

In other UOF data review developments, the MT has continued to meet with the four AV captains and discussed methodologies to assess use-of-force investigations and data analysis associated with the quarterly reports. All four AV captains enthusiastically shared their insights and desire to develop and analyze use-of-force related data.

The CPE's work with the Department, discussed in detail in the Stops section, is ongoing and will include analysis of UOF data from the perspective of potential disparity across the demographic characteristics of the subjects of force. CPE is also developing a UOF dashboard to provide more current information, although this may be found to be redundant with the POINT system.

4. Audit and Accountability Use-of-Force Internal Audits

The Audit and Accountability Bureau's engagement and collaboration with the MT in relation to the SA-related auditing processes continued to improve under the leadership of the recently appointed AAB captain. During this reporting period, MT staff met with the AAB captain and key staff members on several occasions to develop an annual audit plan that includes a specific emphasis on SA-related auditing processes. Additionally, AAB worked with MT audit subject matter experts and developed a series of micro audit workplans that will allow AAB auditors to conduct timely and contemporaneous audit assessments of uses of force that occur within not just the AV but all of NPD. This process will allow AAB to provide station captains with more timely and actionable findings.

The MT is hopeful that these steps forward by AAB will soon position it, where appropriate, such that their audits can be utilized in MT assessments of LASD's SA compliance.²⁶

5. Executive Force Review Committee (EFRC) and Critical Incident Review Panel (CIRP) Reviews

The most serious uses of force (Category 3) are reviewed within a week or two by the Critical Incident Review Panel (CIRP) to identify any preliminary risk management concerns related to policy, training, tactics, current Department practice, and or the actions of the involved employees. Investigations of these cases are typically conducted by the Homicide Bureau for any criminal aspects and then by Internal Affairs (IA) for the administrative aspects.

Once the Homicide and IA investigations are complete, the Executive Force Review Committee (EFRC), which consists of three commanders, reviews the incident in its entirety to determine whether the tactics and force used were consistent with Department policy and to identify any other issues needing to be addressed. If the EFRC determines a deputy's actions violated Department policy, it is also charged with determining the corrective action and level of discipline to be imposed.

The MT monitored each of the AV reviews conducted by the CIRP and EFRC during this reporting period. For each case, the MT has provided feedback to the Department, which is summarized here.

a. *Critical Incident Review Panel*

The CIRP reviewed three AV cases this period, all of which were monitored by the MT. The MT found that the CIRP's review of two cases was sufficient given the fairly straightforward nature of both incidents. However, the third incident was much more complex. The MT found that the CIRP focused their attention on the more narrow and technical aspects of the incident rather than devoting sufficient attention on the broader and much more significant issues and themes it is charged with reviewing, such as "risk management concerns related to policy, training, tactics, current Department practice and/or the actions of the employee(s) involved in the critical incident."²⁷ Specifically, in the third case the Panel failed to discuss any of the following concerns.

- How was the deputy returned to field duty the same year in which two of his prior uses of force were found to be out of policy; and what conditions, if any, were placed on his being returned to the field?
- What was done about the concerning use-of-force pattern the deputy began displaying almost immediately after being returned to the field?
- How did this deputy become a field training officer (FTO) the same year he was found to have been involved in two out-of-policy uses of force and right after he was returned to the field after being on restricted duty for several years?

²⁶ SA Paragraph 149: "Where appropriate, the monitor will make use of audits conducted by . . . Audit and Accountability Command . . . taking into account the importance of internal auditing capacity and independent assessment of this agreement".

²⁷ MPP 3-09/330.00—Critical Incident Review Panel.

- How can this deputy become a FTO when California Government Code section 7286 prohibits a peace officer from training other officers for a period of at least three years from the date an abuse of force is substantiated?

Our earlier CIRP reviews also identified issues related to the Department’s policy regarding returning deputies to field duty following a shooting, which is discussed further below. Until the CIRP consistently recognizes and addresses the broader policy and practice issues that are clearly apparent in some of these cases, it will remain out of compliance with the Settlement Agreement.

b. Executive Force Review Committee

There were seven cases reviewed by the EFRC this period. Four of those reviews occurred before the EFRC chair made a significant structural shift in how the EFRCs would be conducted, which took effect May 2, 2024. The MT found that three of those four earlier cases had significant unaddressed issues.

- LASD personnel investigating a case involving a vehicular pursuit that ended in a deputy-involved shooting failed to interview important witnesses, including the CHP officers who were in pursuit of the suspect just before the shooting occurred. Despite the lack of key information, the EFRC proceeded to adjudicate the pursuit aspect of the case as being in policy, even though they lacked sufficient information to reach a reliable conclusion.
- Two deputies conducting a follow-up investigation on a market robbery were told that someone had tried to open the door of their patrol car. The deputies contacted the individual, found him to be intoxicated and uncooperative, then arrested and charged him with attempted Driving Without Owner’s Consent. The subject was injured during an altercation that ensued when the deputies were handcuffing him. The EFRC never probed the appropriateness of the charge or if the de-escalation efforts taken were sufficient.
- In a case involving a deputy who shot himself in the leg as a result of an unintentional discharge, the weapon was never examined because Department policy only requires an examination of a weapon involved in an unintentional discharge in those situations involving Department-issued weapons that appear to have malfunctioned.²⁸ That policy, or guideline, contains no standard for the person on how to determine whether a firearm “appears to have malfunctioned,” nor does it require the examination of privately owned firearms carried on or off duty. The EFRC never addressed the major risk management issues raised by that policy, such as would occur if a member of the public is injured due to a flawed firearm being used by an on-duty deputy. After the MT raised this issue following the EFRC, the Department decided that every weapon involved in an unintentional discharge should be examined by a qualified armorer to determine whether it is safe to be carried in the field.
- EFRC members have indicated that, when making policy decisions about force cases, they rely heavily on the district attorney’s decision to file or not file a case. This fails to recognize or

²⁸ This topic is addressed in the LASD Internal Affairs publication Guidelines for Handling Unintentional Discharges.

appreciate the fact these are two very different processes that require determinations to be made that are based on distinct and separate standards. The DA's decision is based on assessing violations of law to determine if criminal prosecution should be pursued while the EFRC's decision is based on determining whether there has been adherence to Departmental policies and, if not, whether administrative sanctions are necessary.

The significant changes that have been made to the EFRC process, which the MT wholly supports, included the following.

- The EFRC has returned to in-person reviews, which had ceased during the Covid epidemic.
- Remote access will be available only to those who need to attend but are unable to attend in person.
- Participation is limited to the EFRC members, Professional Standards Division staff, invitees, and oversight agencies.
- Pre-EFRC meetings, which were previously held on Wednesday mornings, are no longer conducted. (We understand this practice was originally started several years ago to give OIG staff an opportunity to seek clarifications.)
- Training Bureau will now respond to questions related to training and/or tactics but will no longer be asked to assess the incident.
- Instead, the Unit Commander, who up to this point has been mostly a spectator, will be responsible for reviewing the incident in detail and providing the EFRC with insight on the involved deputies.

The Department indicated the purpose of the changes was to maximize the Department's policy and tactical reviews of Category 3 uses of force and promote a more robust discussion between the Division Chief, Unit Commander, EFRC Panel, Office of Inspector General, and County Counsel.

Significant improvement was noted in the three EFRCs conducted following the changes that were put in place. The emphasis on the station captains analyzing an incident and providing insight on the involved deputies is particularly helpful, as is limiting the Training Bureau's input to advising the committee on training standards rather than inappropriately engaging them in evaluating or commenting on whether the actions were in policy. All three of the cases handled under the new process occurred in Lancaster; in each case, the station captain provided a very thorough analysis of the case, clearly recognizing the positive aspects of the case as well as where deputies fell short of Department standards. The Training Bureau kept to their designated role of informing the Committee on training standards. The MT has not yet received the EFRC's findings memo to evaluate the final adjudication decisions in those cases; they will be assessed in the next reporting period. We will continue to observe EFRCs but are confident that this new process should help bring the Department into compliance with the SA requirement for the EFRC process.

c. Returning a Deputy to Field Duty

As discussed in the last two semi-annual reports, in early 2022 we began noting inconsistencies in the way deputies had been returned to field duty following a deputy-involved shooting. Some seemed to

have been returned prior to the CIRP being conducted while others were not. Over the following year, we met with Department representatives and exchanged documents to ensure clarity surrounding the process and what the MT's concerns have been. The Department subsequently concurred with us that the process for returning a deputy to the field following a shooting or other critical incident needed to be more clearly articulated in Department policy and that managers needed to document those decisions. The MT reviewed a draft of the subsequently developed guidelines. We informed the Department that we very much appreciated the effort that went into developing the draft handbook and supported the effort to consolidate the process into a single source. We identified areas of the guidelines still lacking sufficient clarity and will continue to work with the Department to finalize the rules governing this critical risk-management decision.

6. Department Response to MT's 4th UOF Audit

In our last report, we discussed our audit of AV deputies' NCI, Category 1, and Category 2 uses of force. The parties agreed that the MT audit's sampling methodology would specifically focus on deputies who had been identified in the Department's risk management processes so the Department could improve its organizational governance involving the use, investigation, review, and adjudication of deputies' UOF.

Our fourth UOF audit found that seven (23%) of the 26 cases, all in Palmdale, did not have serious issues either in the use of force or the way that force was investigated and adjudicated. However, we found that 19 (73%) of the remaining 26 cases had at least one significant issue that placed them out of policy and SA compliance. The audit findings generated several recommendations for the Department's attention, which included applying corrective action plans to the issues and cases raised in the MT audit, establishing a UOF tracking system, holding AV commanders accountable for conducting timely and thorough reviews of force, finalizing the UOF policy, expediting related training development, and recognizing and commending deputies who had conducted themselves in exemplary manners in cases reviewed by the MT.

On June 14, 2024, the Department provided a comprehensive response to the MT's audit, which included noting many areas in which the Department had or was in the process of improving its systems and accountability measures and taking necessary steps toward fostering transparency, trust, and community safety in the AV. The AV captains have also met with MT staff and discussed the audit findings and accountability measures. The Department's response is summarized below. Several elements have already been discussed above, while others will be assessed by the MT in the next reporting period.

- The Department's UOF and Taser policies have been approved, and the Training Bureau is developing associated training (see above).
- NPD executive management are now conducting weekly meetings with NPD unit commanders to conduct preliminary reviews of Category 2 uses of force (see above).
- North Patrol Division has implemented and is actively using the STOP data dashboard and the POINT risk management dashboard to help identify trends in stops, use of force, and complaints (see above).

- NPD captains, operations staff, training staff, and division staff look for any trends, tactical issues, or potential policy violations. The purpose is to identify and immediately address issues, provide timely feedback, and develop corrective action plans. As an example of the result of these reviews, NPD has worked with OCP to develop training bulletins. For example, Training Bulletin 24-01 addressed concerning trends involving Taser use.
- The AV captains have met with Training Bureau staff about developing refresher courses for using Tasers, de-escalation, foot pursuits, and backseat detentions.
- Certified defensive tactics instructors will conduct immediate remedial training related to use of force.
- Briefing documents and training have been developed to emphasize the importance and need to utilize de-escalation techniques when encountering tense and evolving incidents so as to resolve those incidents without having to use force, whenever possible.
- The AV captains regularly attend station roll call briefings to speak with the patrol deputies. During these meetings, they have in-depth, candid conversations regarding their expectations and how they align with the SA.
- The AAB Annual Audit Plan now includes multiple audits specifically designed to assess Palmdale and Lancaster stations' compliance associated with the use, investigation, and adjudication of force by AV deputies (see above).
- The AV stations' Compliance Teams will implement a series of "mini" weekly UOF audits of two NCIs, two Category 1s, and one Category 2 UOF, which will be presented to the station captains to assist in the identification of problematic or commendable actions and processes.
- The AV captains are addressing the lack of timeliness in the submission of administrative staff work, the inconsistent report writing of the deputies, and the lack of accountability and timely follow-up by sergeants in addressing issues related to the use of force.
- Sergeants and lieutenants are bringing concerning issues to station captains' attention immediately after reviewing an incident. For at least three of these, an administrative investigation was initiated related to misconduct or poor tactics.
- The AV captains have provided counseling and issued Performance Log Entries (PLEs) to sergeants and lieutenants for late staff work.
- Since transitioning to the two-captain model, there has been a 39% reduction in the number of pending and overdue use-of-force investigations, which begins to address Monitors' previously noted concerns associated with promptly identifying issues of concern, including excessive force and insufficient de-escalation efforts.

7. Successes and Obstacles

The changes the Sheriff has made in leadership at the AV stations, North Patrol Division, the Audit and Accountability Bureau, and the Training Bureau, along with the outstanding leadership from the Office of Constitutional Policing, have been instrumental in fostering improved accountability at the management level, while also encouraging more innovation and motivation at all levels of the Department. The finalization of the UOF policy is reflective of the substantial shift in commitment to not only achieve SA compliance but, more importantly, to embrace the underlying spirit of the SA and work

required to ensure that LASD deputies receive the necessary training, guidance, and support that will ensure the AV community receives the law enforcement services they deserve.

8. Next Steps

a. *LASD*

- Training Bureau will complete necessary revisions to UOF training reflecting the approved UOF and Taser policies; submit to MT and DOJ for compliance review.
- Training Bureau will continue to provide updated use-of-force training focusing on ground control techniques.
- Continue conducting CIRP and EFRC reviews including the incorporation of MT and DOJ feedback.
- Continue to conduct weekly meetings to perform preliminary assessments of Category 2 use-of-force investigations to identify any risk management, policy compliance, training, and/or managerial accountability issues requiring attention.
- AAB will conduct mini use-of-force audits designed to assess Palmdale and Lancaster Stations' compliance with department policy and the Settlement Agreement.

b. *The MT*

- Continue to collaborate with AAB staff in its SA-related auditing processes in the AV.
- Conduct reviews of SA-related AAB audits plans and reports.
- Attend and assess the Department's updated training related to use of force, including but not limited to defensive tactics, de-escalation, ground control, and the Taser-10 instructor certification.
- Continue to meet and collaborate with AV unit commanders and the AAB captain to provide consultation to assist the Department in achieving SA compliance.

9. UOF Compliance Status Table

Table 6 provides the compliance status for each paragraph in the UOF section.²⁹

²⁹ The table reflects the results of three MT audits focused on the lesser uses of force (Categories 1 and 2: October 2018, July 2021, November 2023) and one MT audit specifically examining the most serious use of force (Category 3: November 2019). Also, unless noted, any reference to Category 1 in this report includes Category 1 and the lowest levels of force, non-categorized force incidents (NCI).

TABLE 6

USE-OF-FORCE COMPLIANCE STATUS

SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
102, 104, 105	LASD to revise use-of-force policy.	Yes	No	Cat 1 and 2: No Cat 3: No	No
	Notes: LASD now has a compliant UOF policy and a conditionally approved CEW/Taser policy. As noted in previous reports, the MT audits have also examined the extent to which deputy use of force in the AV and the investigations of those incidents were in compliance with the SA. The MT's fourth audit found that LASD is not in compliance with several UOF provisions.				
103	Use de-escalation techniques before resorting to force and reduce force as resistance decreases.	Yes	No	Cat 1 and 2: No Cat 3: No	No
106g	Prohibit using force on a person legally recording an incident.	Yes	No	Cat 1 and 2: Yes Cat 3: Yes	No
107	Prohibit head strike with impact weapon unless deadly force is justified, and report unintentional head strikes.	Yes	No	Cat 1 and 2: Yes Cat 3: Yes	Yes
	Notes: The Department is in sustained compliance with 107 because there have been no cases in any of the four UOF audits (beginning October 2018) where a deputy delivered a head strike with an impact weapon to a person's head.				
108a	Deputies will report force incidents.	Yes	No	Cat 1 and 2: Yes Cat 3: Yes	Yes
	Notes: The Department is in sustained compliance with 108a because there have been no indications of unreported force in any of the four UOF audits (beginning October 2018).				
108b	Deputy reports will completely and accurately describe the force used or observed.	Yes	No	Cat 1 and 2: No Cat 3: Yes	No
109	UOF reports will be without boilerplate language, and deputies held accountable for omissions or inaccuracies.	Yes	No	Cat 1 and 2: No Cat 3: No	No
110a	Deputies will notify supervisors immediately of the use of force.	Yes	No	Cat 1 and 2: Yes Cat 3: Yes	Yes
	Notes: The Department is in sustained compliance with 110a because in every audit case in the four UOF audits (beginning October 2018), the force was immediately reported to a supervisor.				
110b	Deputies will notify supervisors immediately of any allegations of excessive force.	Yes	No	Cat 1 and 2: Yes Cat 3: Yes	No
	Notes: 110b will be assessed in the next MT complaints audit.				

TABLE 6					
USE-OF-FORCE COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
111a–d	Perform thorough UOF investigations.	Yes	No	Cat 1 and 2: No Cat 3: Yes	No
111e	Supervisors will thoroughly review deputies' UOF reports.	Yes	No	Cat 1 and 2: No Cat 3: No	No
112a	Independent supervisory use-of-force investigations.	Yes	No	Cat 1 and 2: Yes Cat 3: Yes	No
112b–e	Supervisor's UOF investigation reports will be complete.	Yes	No	Cat 1 and 2: No Cat 3: Yes	No
113	Management will review thoroughness of UOF investigations.	Yes	No	Cat 1 and 2: No Cat 3: No	No
114	Executive Force Review Board will thoroughly review Category 3 force.	Yes	Yes	Cat 1 and 2: NA Cat 3: No	No
	Notes: LASD has policies in place for the EFRC review process. Ongoing reviews of EFRC processes have shown an improvement, but the Department remains out of compliance. (Paragraph 114 does not apply to Category 1 or 2 uses of force.)				
115	Deputies held accountable for force that violates policy.	Yes	No	Cat 1 and 2: No Cat 3: No	No
116	Supervisors held accountable for inadequate investigation.	Yes	No	Cat 1 and 2: No Cat 3: No	No
117	AV commanders identify and curb problematic UOF trends.	NA	Unable to Assess	Cat 1 and 2: No Cat 3: No	No
	Notes: NPD's RMF and the AV stations' quarterly reports track uses of force, but insufficiently for compliance. The Parties and MT need to establish a compliance metric for Paragraph 117.				
118	LASD and AV unit commanders will regularly review and track "training and tactical reviews."	Yes	No	Cat 1 and 2: No Cat 3: No	No
	Notes: The MT has not found any indication that informal supervisory feedback was replacing the need for formal discipline, but the first three audits found that LASD data systems were not able to store the training and tactical review section of UOF reports. This item was not assessed in the fourth audit. The Parties and the MT need to establish a compliance metric for Paragraph 118.				

TABLE 6					
USE-OF-FORCE COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
119	Updated UOF training is provided.	Partial	No	No	No
	Notes: Since early 2021, LASD has been working to revise the UOF training, but it still falls short of SA Paragraph 119a–e mandates. The Department’s new leadership team reports that they are in the process of completely overhauling its UOF-related training to incorporate ICAT principles and to achieve national best practices in this area.				
120	LASD to conduct annual analysis of UOF data and trends and correct deficiencies identified by the analysis.	NA	NA	No	No
	Notes: The Department did not meet its goal to begin conducting this analysis in 2022 or its subsequent goal for early 2023. The Department has indicated the UOF analysis will be included in the scope of work for CPE; the MT looks forward to reviewing a UOF analysis work plan when it is provided.				
121	LASD’s UOF analysis to include frequency and nature of UOF referred to IAB, subject of complaints or civil suits, related to obstruction or resisting arrest charges, and involving repeat deputies or units.	NA	NA	Partial	No
	Notes: The risk management dashboard (POINT) implemented in this reporting period is a step toward compliance with this provision as it provides managers ready access to information regarding UOF data trends and policy and training considerations. In the upcoming reporting period, the MT will assess whether the AV stations are analyzing all the required data, whether via POINT, the CPE analysis, or other processes.				
122	LASD to assess if changes to UOF policy or training are needed based on analysis.	NA	NA	No	No
	Notes: In the upcoming reporting period, the MT will assess whether AV station managers are effectively using the POINT system, the CPE analysis and/or other analyses to identify the need for changes to policy or training.				
123	LASD to produce annual public report on UOF data and trends.	NA	NA	No	No
	Notes: The MT has not been informed of how LASD intends to meet the requirement for a public report on UOF data and trends.				

H. Personnel Complaint Review

In this reporting period, the Department's efforts regarding the Complaints section of the SA focused on planning and conducting AAB audits of complaints. Progress on approval of revisions to the Department's complaints policies was understandably delayed as other priorities took precedence.

1. LASD Complaint Policies

- The Department remains out of compliance for implementing revised Complaints policies.

The MT looks forward to the publication and implementation of the MPP chapter on Complaints, the Administrative Investigations Handbook, and the SCR Handbook. The Parties and MT have reached an agreement for publishing these policies.³⁰ We realize that the process of finalizing the use-of-force policy appropriately took precedence during this reporting period. Now that LASD is in compliance with the UOF policy, we look forward to being able to focus attention on the processes related to handling public complaints and completing the last significant complaints-related policy, the Guidelines for Discipline.

2. LASD AAB Audits of Complaints

- The Department remains out of compliance with the SA requirement that it complete semi-annual audits of complaints (SA Paragraph 140).

As discussed earlier in this report, the Department's Audit and Accountability Bureau (AAB) has demonstrated a significant increase in attention to the SA requirements and efforts to ensure the production of useful, actionable audit reports. To align AAB with best-practices, LASD sent key AAB personnel to a highly respected audit class for law enforcement. Additionally, AAB also embraced the approach used in the most recent MT UOF audit that relied on a smaller, strategically selected sample to test compliance with focused objectives, as requested by LASD's executive leadership. This approach

³⁰ The agreement makes approval of the SCR Handbook, the Complaints chapter of the MPP, and the AI Handbook contingent on three interrelated DOJ and MT concerns. First, nearly every complaint is currently handled as a "service comment," for which only non-disciplinary dispositions are available; complaints are rarely elevated to an administrative investigation, which allows for stronger responses to misconduct. The Parties agreed to revisit this structural concern and to revise these policies should future Monitor or AAB audits reveal non-compliance with SA Paragraphs 127–132. Second, some complaints are currently assessed with an abbreviated investigation called a Pre-Disposition Settlement Agreements (PDSAs) which may not identify all the critical information needed to make a reliable adjudication. This aspect of the policies may also be revised if future MT or AAB audits identify issues with PDSA investigations. Third, none of the three policies sufficiently address SA Paragraph 129, which requires LASD policies clearly specify (1) which allegations of misconduct, if found to be true, require discipline; (2) what types of complaints must be subject to administrative investigations as opposed to SCRs; and (3) which administrative investigations must be handled by IAB rather than at the unit level. If the revisions to the final (fourth) complaint document, Guidelines for Discipline and Education-Based Alternatives, do not address Paragraph 129, the parties may need to revisit the other policies in order for compliance to be met.

allows for audit reports to be produced much more quickly, thereby providing Department managers with timely insight into what is or is not working. AAB is using this approach for its 2024 complaint audits and we are optimistic it will allow them to come into compliance with the Paragraph 140 requirement of semi-annual complaint audits once the audits planned for the second half of the year are completed. The MT has met in person with AAB leadership and auditors several times this period answering questions and providing them with technical assistance on conducting meaningful audits. The Monitors and DOJ approved complaint audit workplans for the first and second half of 2024.³¹

Toward the end of this reporting period, AAB submitted an audit report addressing complaint investigations initiated in the third quarter of 2022. While the MT is currently reviewing this audit in detail, our preliminary evaluation is favorable and may represent the “breakthrough” we have been seeking that reflects an ability for the Department to conduct comprehensive and objective audits of this nature. The 87-page report is quite comprehensive, covering all aspects of the SA’s requirements to have complaint material on display, willingly intake complaints, thoroughly investigate them, and adjudicate them using a “preponderance of evidence” standard. The audit findings themselves were not encouraging—for the 2022 investigations that were reviewed, findings show that complaint phone calls to the stations were ignored, complaint letters went unanswered, investigators did not identify all substantive allegations, and captains did not provide adequate oversight of the complaint process. But the audit itself identified those issues and made helpful recommendations to improve the process. Once the MT’s detailed review is completed, we will submit any findings to the Parties. We should note the complaints examined in this audit had occurred before the current AV management teams were put in place. To ensure the weaknesses identified in that audit have been addressed and so everyone understands what is required for compliance, a debrief will be held in July where AAB auditors will review their findings and recommendations with the AV management teams. Hopefully, the follow-up audits underway will serve to show any improvements made in this critical area.

3. Improve the Department’s Complaint Process

Prior audits have identified several areas needing improvement, particularly related to complaint intake. For example, audits have identified problems with the 800 number given to the public to make personnel complaints, and the way in which station desk personnel intake complaints and put them in contact with the on-duty watch commander. As noted elsewhere in this report, the CACs also continue to raise this concern. The AAB audits are focusing on these identified deficit areas and other critical processes, and we await their findings.

³¹ LASD is eligible for compliance with SA Paragraph 140 after they produce the required complaints audits for one year. Compliance requires approved audit plans before conducting the audits, which has been achieved, and approved audit reports after the audits are completed. The soonest this would likely occur would be early in the reporting period beginning January 2025.

4. Complaint-Related Training

- The Department remains out of compliance with the SA’s complaint-related training provisions (SA Paragraphs 138–139).

We anticipate that the Department will be submitting a curriculum to train its supervisors and managers on the revised process for handling public complaints after related policies are ready for implementation.

5. MT Monitoring of Public Complaints

Members of the public did not bring any new complaints to the attention of the MT during this period. However, an old complaint was adjudicated, and our review of that adjudication raised several significant issues.

In 2021, two deputies stopped a vehicle for failing to stop at a stop sign and/or before the intersection’s limit line. They discovered narcotics in the car, and the driver was booked for “possession for sale.” The deputies wrote reports articulating their probable cause for the stop, then testified to it at the preliminary hearing. However, after the deputies testified again at a motion-to-suppress hearing, the defense produced a photograph of the intersection showing there was no stop sign or limit line, so the judge dismissed the case. The former station captain decided it was just a mistake, but after some prodding by the MT, an SCR was initiated. The SCR was converted to an administrative investigation. In September 2023, the complaint was sustained against both deputies, and they were disciplined for violating two policy sections, one requiring deputies to complete accurate reports and the other requiring deputies to maintain sufficient competency to perform their duties.³² When the MT asked whether the case was subject to California’s mandatory reporting requirements under Senate Bill 2,³³ the matter was referred to Peace Officers Standards and Training (POST), who decided to close the case with no further action.

That leaves the question of the Department’s responsibility relating to *Brady* requirements for notifying the District Attorney when there are issues regarding a deputy’s credibility.³⁴ When we made an inquiry in that regard, the Department informed us that the policy violations sustained against the two deputies were not subject to a *Brady* notification under the current LASD system. However, we were also informed that the Department is reviewing its *Brady* alert process to ensure that all appropriate MPP sections are included for review in the process. The MT remains concerned that a sustained complaint of incompetent completion of official police reports does not rise to a level that would require disclosure under *Brady*. We will monitor and report on the Department’s review and determination surrounding *Brady* reporting requirements.

³² MPP 3-01/005.10—Responsibility for Documentation, and 3-01/050.10—Performance to Standards.

³³ Cal. Penal Code § 13510.9.

³⁴ *Brady v. Maryland*, 373 U.S. 83 (1963); codified in Cal. Penal Code § 10541(e).

6. Successes and Obstacles

We look forward to observing the process and results achieved once the Department implements the revised personnel complaint process laid out in the SCR Handbook, Department Manual, and Administrative Investigations Handbook. In the meantime, we expect to continue working with AAB and will provide technical assistance, as needed, in the completion of their complaint audits. Because the complaints that will be reviewed are ones that precede the implementation of the revisions currently being considered, the immediate audits will focus on assessing compliance with the former standards for personnel complaints that were in place at the time those complaints were received. Nonetheless, the fundamentals involved in both instances remain much the same. For example, the standards involved in either time frame require that the Department:

- Willingly accepts public complaints;
- Thoroughly investigates all complaints;
- Thoughtfully adjudicates complaints using a preponderance of evidence;
- Holds deputies accountable when they are found to have committed misconduct; and
- Conducts regular and thorough audits to assess whether the policies are consistently followed or if changes to the policies, training, or other processes need adjustment.

7. Next Steps

a. *LASD*

- Publish the MPP chapter on complaints, Administrative Investigations Handbook, and SCR Handbook.
- Revise the Guidelines for Discipline.
- Submit a training plan and curricula for MT and DOJ review and approval.
- Once approved, train personnel responsible for implementation of the revised complaint process.
- Monitor implementation of the new policies to quickly identify any issues that may arise. This will likely prove to be challenging given the Department's decentralized approach to processing and investigating public complaints; for example, the vast majority of complaints are handled as SCRs, which are never seen by IAB.
- Complete the two complaint audits initiated by AAB.

b. *The MT*

- Review and provide feedback on Guidelines for Discipline.
- Review and provide feedback on the training plan.
- Monitor the implementation of the policy and training plan.

- After the revised directives are published, training has been provided, and sufficient time has passed for the new processes to take hold, discuss with the Parties the initiation of a third audit of public complaints.
- Review AAB's audits of public complaints and determine whether it can be used to assess Department compliance with the SA's complaint requirements (Paragraph 149).

Personnel Complaints Compliance Status

Table 7 provides the compliance status for each paragraph in the Complaints section.

TABLE 7 PERSONNEL COMPLAINT REVIEW COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENT	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
Preface	Complaints are fully and fairly investigated and personnel are held accountable.	Partial	Partial	No	No
	Notes: The preface was not in compliance on either audit.				
124	Public has access to complaint forms and information.	Partial	Partial	Partial	No
	Notes: LASD was not in compliance for the first audit, and the MT was unable to assess compliance in the second audit due to COVID-19 restrictions. During a site visit this reporting period, the MT documented that complaint forms were available in six of seven locations. We look forward to AAB’s assessment of this requirement in their audit.				
125	Accept all complaints.	Partial	Partial	No	No
	LEP language assistance.	Partial	Partial	Partial	No
	Notes: LASD was not in compliance with regard to accepting all complaints in either audit. The requirement of providing language assistance was not in compliance for the first audit but was in compliance for the second audit.				
126	Impeding the filing of a complaint is grounds for discipline.	Partial	Partial	Unable to Assess	No
	Notes: The Department was not in compliance for the first audit. In the second audit, the MT identified no complaints that alleged a complainant was impeded, and we were unable to determine compliance. Should no such cases arise in the next audit, the Parties and MT will discuss how to proceed with compliance assessment. Training for this area is monitored in Paragraphs 138–139.				
127	Revise MPP, SCR, and IAB manuals so they are complete, clear, and consistent.	No	No	No	No
	Notes: The Monitors and DOJ authorized the Department to move forward with publishing and implementing the MPP, SCR Handbook, and IA Handbook. A revised Guidelines for Discipline remains to be approved (see footnote 30).				
128	Ensure personnel complaints are not misclassified as service complaints.	Partial	Partial	No	No
	Notes: LASD was found to be in compliance for the first audit but not in compliance for the second audit.				
129	Revise policies for allegations requiring IAB investigation and behavior requiring formal discipline.	No	No	No	No
	Notes: This will be addressed during our discussions on the Guidelines for Discipline.				

TABLE 7 PERSONNEL COMPLAINT REVIEW COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENT	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
130	Ensure each complaint is appropriately classified at outset and review.	Partial	Partial	No	No
	Investigate every allegation even if the complainant did not specifically articulate it.	Partial	Partial	No	No
	Notes: Not in compliance for either audit.				
131	Investigations are as thorough as necessary to reach reliable and complete findings.	Partial	Partial	No	No
	Notes: Not in compliance for either audit.				
132	Refer appropriate cases to IAB or Internal Criminal Investigations Bureau (ICIB).	Partial	Partial	No	No
	Notes: Compliance could not be determined in the first audit because there were no relevant cases in the audit population. There were two such cases in the second audit, and neither one was referred as required. Training is monitored in Paragraphs 138–139.				
133	Investigation conducted by uninvolved supervisor.	Partial	Partial	Yes 12/15/20	No
	Notes: Not in compliance in the first audit but in compliance in the second audit.				
134	Identify all persons at scene.	Partial	Partial	Yes 12/15/20	No
	Notes: In compliance for both audits. Training is monitored in Paragraphs 138–139.				
135	Obtain a full statement from all persons at scene.	Partial	Partial	No	No
	Notes: In compliance in the first audit but not in compliance in the second audit.				
136	Investigator interviews complainant in person or gives justification.	Unable to Assess	Unable to Assess	Unable to Assess	No
	Notes: In our second audit, we were unable to determine compliance, and a discussion is pending with the Parties about our recommendation that the investigator be allowed to rely on the intake interview, providing it addresses the key issues.				
137	Interview witnesses separately.	Partial	Partial	No	No
	Use uninvolved interpreter for people with LEP.	No	No	Yes 12/15/20	No
	Notes: Not in compliance in either audit with regard to interviewing witnesses separately. Also, the Department was not in compliance for the first audit but was in compliance for the second audit with regard to using an uninvolved interpreter.				

TABLE 7 PERSONNEL COMPLAINT REVIEW COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENT	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
138	Provide supervisor and deputy training on intake and investigations.	NA	Partial	Partial	No
	Notes: Directives were issued in 2018, and watch commanders have been trained in those directives. New training will be required after publishing the SCR Handbook, the MPP section, and the Administrative Investigation Handbook.				
139	Provide supervisor training on misconduct investigations.	NA	Partial	Partial	No
	Notes: See Paragraph 138.				
140	Conduct semi-annual audit of public complaints.	NA	NA	No	No
	Notes: The Department is conducting a complaints audit that appears to be focused on assessing compliance with the SA's complaints requirements. We look forward to reviewing it when it is completed.				

I. Accountability

In this reporting period, the Department's efforts relating to the Accountability provisions section of the SA continued to be focused on the following.

- Maintaining reliance on the use of the quarterly reports.
- Improving the effectiveness of the Performance Mentoring Program.
- Improving the Risk Management Forum and Crime Management Forum.
- Pilot the POINT System to eventually replace the quarterly report.

1. Quarterly Reports

One of the major hurdles facing the newly assigned AV captains was the extremely large backlog of use-of-force and complaint investigations. As a result, the quarterly reports, which capture information related to force and complaints as well as other risk management issues, were delayed and the Department was only able to submit the quarterly report for the third quarter 2023 during this reporting period. The Department again consolidated the data for both stations into one Excel report. We find this format much easier to use, and we appreciate the effort made to prepare this consolidated report. We are hopeful that the new online risk management dashboards (POINT) can be used to automate much of the work and thus dramatically reduce the time required to prepare these quarterly reports.

The concerns expressed below notwithstanding, the quarterly reports for each station were generally thorough and provided good insight into patterns of force and personnel complaints, stops, and obstruction arrests. Even though the incidents addressed in this quarterly report preceded the current captains' assignment in the AV, we generally found that their insights and identification of deputies and patterns of conduct that warrant increased supervisory attention were well-considered and accurate. In recent months, a considerable amount of time on the part of the station captains has been devoted to clearing up the large backlog of pending force and complaint investigations. That has been necessary and it may yet require equivalent attention in the coming months, but increased analysis and insights will also be expected as the captains clear the backlog and familiarize themselves with their command, the performance of the various units and shifts, and the sundry personnel matters requiring ongoing attention.

The NPD reviews by both the commander and the chief are also much improved. In the past, NPD's comments tended to be fairly generic, but the comments in these quarterly reports identified specific deputies in need of more focused attention. As described in the UOF section, NPD now holds a weekly review of Category 2 uses of force with the AV captains and their staff to identify those incidents needing timely attention, provide stations with direction, and ensure the investigations are completed and submitted in a timely manner. The NPD reviews also noted FTOs with concerning work histories being responsible for training new deputies and identified the PMP program, which is currently being revised, as a key component in developing AV personnel.

A significant concern we noted in the quarterly report for the third quarter relates to the Lancaster managers failing to identify and address issues involving a sergeant who appeared in the report. (This was the first time a sergeant appeared on the quarterly reports.) The sergeant had six uses of force (three during the third quarter) and one personnel complaint. That level of activity is inconsistent with the role and expectations of a field supervisor. More importantly, this is the same sergeant discussed in our 2023 use-of-force audit who twice directed a trainee to use oleo resin capsicum (OC) spray on a handcuffed 15-year-old girl while she was secured in the backseat of a patrol car on a hot August day and complaining about the heat.³⁵ The quarterly report also shows this sergeant was assigned to supervise/mentor eight other deputies who themselves were on the quarterly report, four of whom are on PMP and have been on these quarterly reports for over three years. This sergeant's performance issues were not addressed in the reviews by the station captains or the NPD reviews, but this should have been done.

It should be noted that many deputies are on these reports for force incidents classified as NCI. While we in no way condone the use of unnecessary force at any level and we recognize that deputies who use NCI force more than their peers may need attention, we believe the inclusion of NCI force in these reports contributes to the excessive numbers of deputies who meet the threshold for inclusion. The unintended result here is that this can obfuscate the activities of deputies who may be most in need of additional supervisory and managerial attention. This is particularly true for deputies in sensitive or peer-leadership positions such as field training officers (FTOs), detectives, and school resource deputies (SRDs). We continue to recommend that the Parties and MT discuss ways to focus attention on the deputies and performance issues of greatest concern while also preserving the quarterly report's ability to identify problematic issues and trends. This is something that should be examined more closely and may require addressing NCIs in a different manner.

2. Coveted Positions

For some time now, we have expressed our concern regarding the number of AV deputies on the quarterly reports who are in prestigious assignments, most notably detectives and FTOs. Recently, two incidents arose which cast serious doubt on the reliability of the system used to select deputies for these peer-leader positions.

As we described in the 17th semi-annual report, in our last analysis of quarterly reports (published November 28, 2023) we identified a problematic case in which a deputy was promoted to field training officer despite the EFRC finding his conduct out of policy in two 2023 cases and despite the second quarter report for 2023 reporting he had a "concerning increase" in the use of force, with 10 incidents in that quarter. The Department noted that the promotion was in line with an agreement between LASD and the deputies' union, despite the fact that the deputy was on PMP and receiving extra supervision and mentoring from his superiors. The MT recommended that the Department reconsider allowing

³⁵ Case L-11 from the MT Use-of-Force Audit November 15, 2023. See <http://www.antelopevalleysettlementmonitoring.info/>

high-risk deputies to be the primary trainers and mentors for new patrol deputies.³⁶ We also note that in December 2023 this deputy became involved in yet another Category 3 use of force and was once again removed from field duty.

In the second incident, from March 2021, “possession for sale” charges were dropped by a judge due to false statements the two arresting deputies had made in their written reports and in court testimony.³⁷ After some prodding by the MT, a personnel investigation was initiated and an allegation of failing to accurately document the incident was sustained against both deputies. While this investigation was being conducted, both deputies were promoted to detective. The case raised the question: How does a deputy under investigation for a significant allegation of misconduct, which, if true, would severely impact the deputy’s ability to testify credibly in court, get promoted to detective? And shouldn’t the potential *Brady* ramifications of a sustained complaint of that nature be considered in making a detective assignment?

These two cases coupled with the large number of FTOs and detectives who consistently appear on the AV stations’ quarterly reports raise questions and concerns about the effectiveness and thoroughness of the process being used to select deputies for these coveted positions. It also raises questions about the appearance of rewarding deputies for behavior that is, or at least appears to be, inconsistent with the Department’s core values. In the case of FTOs, it also puts that deputy in a position to pass on those inconsistent values to a stream of impressionable trainees.

The MT acknowledges that the Coveted Testing Unit and/or the Consent Decree Unit, both within the Bureau of Labor Relations and Compliance, are responsible for maintaining centrally controlled testing standards relating to the appointment of employees to coveted positions, including FTOs and detectives.³⁸ We have been told the selection process involves testing and a background investigation but that unit commanders have little to no say in which deputies are assigned to most of these positions. For a variety of reasons, the input of unit commanders should be considered in those decisions so as to ensure their best people receive these promotions and that their cadre of detectives and FTOs are demographically diverse enough to provide the quality of services needed in their commands and that the community would expect. For example, every detective unit needs some deputies who are fluent in Spanish, or in other languages, in order to serve the command’s community with limited English proficiency. Similarly, a line command’s FTOs need to be diverse in order to pair the right FTO with a trainee. Lancaster, for example, has a large number of female trainees with very few female FTOs and, until recently, practically no female sergeants.

³⁶ The MT also noted that California Government Code, Section 7286 (b) (18) mandates that a deputy cannot serve as a training officer for at least three years after their force-related conduct was found to be out of policy.

³⁷ The deputy’s reports and testimony said the defendant was originally pulled over for failing to stop at a stop sign and/or before the intersection’s limit line, but it was later shown that there was no stop sign at the intersection.

³⁸ Department Manual Section 2-07/140.00—The Bureau of Labor Relations and Compliance

Clearly, this is an area that needs a thorough review, and, because it will require someone with substantial organizational authority to resolve this, it seems appropriate to task the highest-ranking person in patrol and detectives to chair that review. Therefore, we have recommended that the Assistant Sheriffs of Countywide Operations and of Patrol Operations, or their designees, convene a committee (jointly or separately) to review the process for selecting deputies for detective and FTO positions and make recommendations to the Undersheriff and Sheriff to improve this process so the very best deputies are selected for these critical positions.

3. Performance Mentoring Program

- The Department is out of compliance with SA Paragraphs 144 and 145.

The MT's 2022–23 audit of the Performance Mentoring Program showed it to be in disarray, with no formalized procedures at the stations and inconsistency in its delivery and outcomes. In response, the Department has undertaken a complete revamp of PMP at both the unit and Department level.

Both AV stations have assigned a sergeant full time as the stations' PMP coordinator. This is an excellent measure to ensure that deputies in need of focused attention receive it as the PMP revamp work continues. We also noted that the AV stations are trying to maintain supervisory consistency for deputies on PMP, an effort we wholly support.

Meanwhile, the MT met in person with OCP's Performance Mentoring Team twice to discuss the overall approach to a more effective Performance Mentoring Program. We also met in person with the commanders assigned to the PMP Panel, which oversees the program and makes decisions about which deputies are placed on Department-level PMP. We found them all to be conscientious professionals who are very committed to performance mentoring. The challenge is finding an approach that works for a very large and geographically spread-out department.

The previous approach was for Risk Management to provide station and division managers with lists of deputies who met certain criteria and have them evaluate the people on that list, recommending who needs and does not need to be placed on performance mentoring. This "top down" approach did not hold managers accountable for identifying their own problems. It also only required them to deal with deputies who met thresholds in single categories. For example, a deputy would be on the list if they exceeded the threshold for complaints or uses of force. But if a deputy was one incident shy of the force threshold and the complaint threshold, they would not appear on the report. Similarly, they would not be on the report if they were below the force threshold even though most of their force incidents also resulted in a personnel complaint.

In our view, stations should be responsible for identifying their own deputies who need mentoring and taking action to correct their behavior. The PMP Panel should be reviewing deputies who clearly are in need of intervention and then asking their captains, commanders, and chiefs what they have been doing to correct their behavior. With that concept in mind, the PM Team is revising the handbook in consultation with the panel's commanders. That includes a stronger emphasis on the need for unit commanders to identify personnel who should be assessed for mentorship PRIOR to the employee

reaching the assessment criteria. That concept will also be emphasized during the semi-annual Risk Management Forum discussions.

LASD's PM Team has also created the following two new documents.

- Performance Mentoring Meeting Preparation Guide. This document will educate unit commanders on what to expect at a PM meeting and help them be prepared to discuss relevant issues.
- Performance Mentoring Committee Meeting Script. This document will promote consistency during PM meetings and standardize workflow before, during, and after those meetings.

In June, the PM Team was scheduled to have an internal LASD meeting with the PMP Panel to discuss these documents as well as progress on LASD's revisions to the PMP Handbook. The MT looks forward to hearing about the results of that meeting. The MT will continue to provide TA and feedback in the next reporting period. Prior to implementation, the MT and DOJ will need to review and approve the finalized documents.

We were also pleased to see that the Department is developing an application to record and track deputies on PMP, both at the unit and Department level. That application is now being piloted at seven stations (including both AV stations). It will greatly reduce the time required to conduct assessments and move them through the review and approval process electronically. It will also facilitate review by the PMP Commanders Panel. The Performance Mentoring SharePoint site is now live and includes LASD training videos, wellness information, and discipline reports.

Finally, the County has begun a pilot mentoring/coaching program in its Internal Services Division. The PM Team has established liaison with the County program leaders and attended the Los Angeles County Management Counsel Mentorship and Coaching training on May 22, 2024. They will be meeting with the program leadership in June 2024 to discuss the County's mentorship and coaching program and see if anything could be imported into the Sheriff's PMP program. We look forward to hearing more about these discussions.

4. Successes and Obstacles

With the assignment of four new captains in the AV and a new division chief, an immediate priority has been to focus more attention on clearing up the large backlog of complaint and use-of-force investigations. That is the unfortunate reality of being assigned to a command that has been in disarray. The MT is impressed that, even with that increased workload, the AV captains are ensuring more attention and time are being committed to identify and address those deputies whose performance requires increased attention on the part of their supervisors and managers. More important, they are redirecting the supervisors and lieutenants to address marginal behaviors by their subordinates.

We recognize and acknowledge the increased efforts that have been underway by the Department to address ongoing issues of concern, not the least of which is revising its use-of-force policy to comply with California law and to bring this policy and related processes and practices to a point they are

consistent with 21st-century policing standards. Revising the PMP program will also be a significant improvement. Yet some of the outcomes and observations described above, which are based on the 2023 third quarter reporting period, are not yet at the standard expected and intended by the SA; in particular, the current process for assigning deputies to coveted positions is one that is not aligned with the SA objectives or professional organizational standards. The current practice allows deputies to be placed in peer-leadership positions while displaying behaviors inconsistent with the Department's core values. Allowing this to continue sends a message to others that such promotions are possible even though the known behavior and performance is supposedly unacceptable and violative of organizational values. That is organizationally destructive and simply must be corrected immediately.

While the Department is progressing and has made significant strides in the right direction, it remains out of compliance with Paragraphs 62, 117, and 143.

5. Next Steps

a. *LASD*

- Critically review quarterly reports to ensure that essential information is included, significant trends are identified, and any remedial actions needed are undertaken.
- Continue its effort to revamp the Performance Mentoring Program, including revising the PMP handbooks.
- Continue its effort to develop a "front end" system to capture and analyze critical risk-management information as part of an early intervention system.

b. *The Parties and MT*

Determine whether and how the quarterly report thresholds can be refined to better focus on those deputies who are most in need of direction and improvement.

c. *The MT*

- Review quarterly reports as they are submitted.
- Review the revised PMP process when it is submitted.
- Re-initiate the PMP audit when appropriate.
- Continue to provide technical assistance, as requested, on the PMP, data systems, and other topics.

6. Accountability Compliance Table

Table 8 provides the compliance status for each paragraph in the Accountability section.

TABLE 8

ACCOUNTABILITY COMPLIANCE STATUS

SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
141	<ul style="list-style-type: none"> Establish PRMS as LASD-wide decision support system. Modify system to allow peer-to-peer comparisons of deputies and units. AV commanders will conduct periodic reviews of all personnel to identify trends. 	Partial	Partial	Partial	No
	Notes: North Patrol Division published an order in 2019 requiring each AV unit commander to prepare a quarterly report designed to satisfy the elements of Paragraphs 141–143 not provided for by PRMS. The MT reviews of the reports have found them in partial compliance.				
142	<ul style="list-style-type: none"> Modify PRMS to access additional info. Maintain PLEs in electronic format. Ensure PRMS is accurate and that there is accountability for errors. 	Partial	Partial	Partial	No
	Notes: See Paragraph 141.				
143	LASD will establish a plan for periodic review of trends at stations.	Partial	TBD	Partial	No
	Notes: The quarterly reports are one element of this plan, as are performance evaluations, RMF, UOF and complaint reviews, EFRC, AAB audits, etc. The MT’s ongoing compliance review assesses the level of accountability across all these tools and processes. Results thus far indicate partial compliance.				
144	Make modifications to Performance Mentoring Program (PMP); ensure 30-day turnaround.	No	No	No	No
	Notes: The Department is in the process of completely revamping its PMP process, including rewriting the PMP handbook and developing a computer program to facilitate consistent administration of the program.				
145	Coordinate between Department-wide and Division PMP.	No	No	No	No
	Notes: See Paragraph 144.				

III. CONCLUSION

We continue to appreciate Sheriff Luna's willingness to address topics that his predecessors were resistant or reticent to take on, including the undertaking of much-needed upgrades that were long overdue in areas such as the Department's data systems, accountability processes, and deputy mentoring, and embracing the concepts and practices recommended in the *Final Report of the President's Task Force on 21st Century Policing*. Most notable in this reporting period was the approval of the critical policy on the use of force. Now that this policy is approved and the Department will be moving into the training and implementation stage, the MT believes this will profoundly influence decision making and actions taken in the field, as well as improvements in the quality of investigations into those incidents. We look forward to working with LASD and DOJ over the next reporting period and anticipate continued gains.

APPENDIX A: MONITORING TEAM AND WEBSITE

Monitoring Team

The Court-appointed Monitors—Dr. Angie Wolf and Joseph Brann—have assembled an experienced team with credentials and skills uniquely suited to the SA work. The membership of the MT was finalized in March 2016. The two Monitors and seven team members have extensive expertise and experience in monitoring and evaluation work in policing and corrections.

Additionally, most of the MT members have served in law enforcement or continue to have distinguished careers in this field, several in the Los Angeles area. Several have served in leadership positions in law enforcement or corrections agencies during the implementation of the compliance period of a settlement agreement or consent decree and therefore understand the unique challenges that large organizations face in those circumstances. The MT members also have expertise in dealing with the diverse issues addressed in the SA, such as those related to UOF, training, the Fair Housing Act, data collection and analysis, survey methods, and the complexities of community engagement.

Antelope Valley Monitoring Website

This website allows AV community members to learn more about the SA, the backgrounds of MT members, and the monitoring activities; access documents related to the monitoring work, including each semi-annual report, each Community Survey report, MT audits, and MT data analyses; follow links to LASD's homepage and other relevant websites; and, importantly, submit questions and comments directly to the MT.

The website's URL is www.antelopevalleysettlementmonitoring.info

APPENDIX B: SETTLEMENT AGREEMENT COMPLIANCE

Much of the SA involves developing or revising policies, procedures, and training; putting into place various processes (such as a plan for ensuring all new AV deputies receive training mandated by the SA or additional accountability mechanisms to facilitate peer comparisons); assessing data and information to guide the implementation of required reforms and to determine their effects; and striving to more effectively engage with community organizations and entities, such as the Community Advisory Committees (CACs). This work is usually done collaboratively among the Parties and the MT, with documentation of the change (new policy, revised training, etc.) eventually being formally submitted to the MT and DOJ for approval.

For most provisions, several steps are involved before the Department can reach full implementation (SA Paragraph 20) and thus achieve the status of being in full compliance. Paragraph 149 states, "Compliance with, or implementation of, a material requirement of this Agreement means that LASD has: (a) incorporated the requirement into policy; (b) trained all relevant personnel as necessary to fulfill their responsibilities pursuant to the requirement; and (c) ensured that the requirement is being carried out in practice."

Any approved policies related to the SA must be distributed to every deputy according to SA-required procedures and, as necessary, incorporated into training curricula. An approved training curriculum will require documentation that appropriate personnel received the training. New procedures and processes must be successfully instituted. Most importantly, each of the established improvements must be proven effective and practical in the real world—that is, they are assessed through MT activities such as reviews, audits, interviews, observation, and data analysis to establish whether they are successfully reflected in law enforcement practices and achieve the intended qualitative and quantitative impacts on the AV community. Paragraph 153 lays out several qualitative and quantitative outcome assessments the MT will do "to measure whether LASD's implementation of this Agreement has eliminated practices that resulted in DOJ's finding a pattern and practice of constitutional violations."

Changes to policy and practice also must be incorporated into LASD-AV's accountability practices. The reviews, analyses, studies, and audits that the SA requires LASD to conduct must use appropriate methodologies, and, in turn, their findings must be used effectively to inform policies and practices.³⁹ Finally, this level of performance must be sustained for one year to achieve full and effective compliance and to satisfy the terms of the SA (Paragraph 205). In some cases, the SA requires ongoing improvement in the delivery of services (Paragraph 15).

³⁹ Paragraph 171b gives a summary of the stepwise process by which the Monitors assess compliance and document their findings. Each provision of the SA needs to be "(1) incorporated into policy; (2) the subject of sufficient training for all relevant LASD deputies and employees; (3) reviewed or audited by the Monitor to determine whether they have been fully implemented in actual practice, including the date of the review or audit; and (4) found by the Monitor to have been fully implemented in practice."

This process of achieving compliance is laid out in various provisions of the SA, especially through the following paragraphs.

- In Paragraph 20, implementation is defined as “the development or putting into place of a policy or procedure, including the appropriate training of all relevant personnel, and the consistent and verified performance of that policy or procedure in actual practice.” What is meant by “consistent and verified performance” is to be laid out in compliance metrics for each provision.
- According to Paragraph 205, the terms of the SA will have been met when “the County has achieved full and effective compliance with the Agreement and maintained such compliance for no less than one year.”
- In Paragraph 15, full and effective compliance is defined as “achieving both sustained compliance with all material requirements of this Agreement and sustained and continuing improvement in constitutional policing and public trust, as demonstrated pursuant to the Agreement’s outcome measures.”

Compliance metrics or measures represent the specific quantitative and qualitative criteria by which the MT will assess compliance with each SA provision. The written metrics reflect the language of the SA, but they also ensure the Parties and the MT agree on how the SA language translates into workable and measurable standards for LASD-AV policy and practice and for assessing compliance.

It is important to note that the SA was not written in a “check the box” fashion that would require or allow each provision to stand separately such that it would then be evaluated based on a single, straightforward compliance metric for each provision. The assessment work that is required to evaluate the intended outcome for one provision is sometimes dependent upon the activities of and relationship to other provisions, and therefore they are interconnected. For example, the Department cannot draw conclusions about the potential disparity in its programs and activities (SA Paragraph 68) without completing the assessments required of deputy performance, stops, community input, uses of force, and complaints (SA Paragraphs 67, 82–86, 88, 120–123, 140). Similarly, the MT’s compliance assessment for one provision may partially depend on the compliance assessment for another. In short, in some cases, as long as the Department is not in compliance with one provision, it necessarily will be out of compliance on one or more other provisions.