

Antelope Valley Monitoring Team 19th Semi-Annual Report



December 2024

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I. INTRODUCTION

This is the 19th 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 July and December 2024.

In this reporting period, LASD has made significant progress toward compliance, especially in those areas and provisions requiring improvements in data analysis. The Department is required to collect various data points and to use them to drive important decisions about policing tactics and management responsibilities. As noted in previous reports, antiquated data systems and a lack of appetite for data analysis led to stagnation on many SA provisions. Under the administration of Sheriff Robert Luna, LASD has intensified efforts to adopt and embrace the usage of new, contemporary data collection systems, and, crucially, in the interim has dedicated internal resources to the development of a series of dashboards and applications that allow for LASD to have timely access to data. For years, we had understood this task to be almost impossible due to lack of resources. Sheriff Luna, however, dedicated a technology team to this issue, and within a year, LASD has a series of internally and externally facing dashboards that will serve as the building blocks of SA compliance.

Sheriff Luna also tasked the Audit and Accountability Bureau (AAB) with conducting data-driven audits that provide honest critiques and actionable findings and recommendations, which the stations are expected to use to improve operations in substantive ways. LASD created an electronic application to better manage and track the performance of deputies in the revamped Performance Mentoring Program (PMP). Station and division leadership have matched this effort with their own appetite for data, and are applying their own professional scrutiny to the dashboards, the AAB audits, and other sources of data and information to inform policing strategies, identify both positive and problematic trends, genuinely engage with the community, and respond to issues as they are identified. Moreover, instead of remaining siloed and separate, the various units work together, with station captains and North Patrol Division (NPD) managers providing feedback and additional requests to the builders of the dashboards, auditors and trainers. The stations also collaborate with the Training Bureau so that AV deputies are more quickly provided important training and refreshers.

LASD also procured the most advanced version of the Taser and has ensured AV deputies have been trained in the use of this important tool, which can help avoid the use of lethal force.

Perhaps progress is best exemplified by the following changes in compliance status.

- Sixteen provisions (paragraphs or subparagraphs) moved from "unable to assess" or "no compliance" to "partial compliance".
- Fifteen provisions moved from "no compliance" or "partial compliance" to "compliance."

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

- Six provisions moved from “compliance” to “sustained compliance.”

During a recent meeting, we asked one of the station captains how things had changed since he was involved in the compliance efforts as a station sergeant. He said, “We did the best that we could at the time, but we didn’t have support from the top.” They do now. Previously, our perception was that LASD leadership expected change to be isolated to the AV and the responsibility of the Compliance Unit. However, because most of the paragraphs have ramifications for the Department as a whole, without broader Department buy-in, failure was inevitable. Sheriff Luna has embraced 21st-century policing practices and a shift has occurred: Instead of being perceived as behind the rest of the Department, the AV stations are now the vanguard.

Many individuals are responsible for this successful reporting period. The Monitors appreciate the hard work of all the professional staff, deputies, supervisors, and managers at the AV stations, the Compliance Unit, NPD, other units such as the Risk Management Bureau (RMB) and the Training Bureau, and Office of Constitutional Policing (OCP). In particular, we appreciate the leaders who have stepped up and are engaged in changing the culture and improving the performance of LASD. We will name just a few of those who deserve acknowledgment. Captains Paul Bartlett, Joseph Fender, Richard Cartmill, and Joshua Bardon are hard working, resourceful, and collaborative, and they demonstrate great capacity to engage with data as well as the community. We would like to thank Commander Rodney Moore for his leadership at the OCP and contributions to AAB. We congratulate him on his retirement. We are grateful for all of the persistence, patience, and creativity of the Compliance Unit personnel, particularly Lieutenant Steve Upton and Sergeant Ray Hicks, whose efforts over the years have made way for the unprecedented progress witnessed over the last year. We congratulate Lieutenant Upton on his promotion. The impressive data progress was largely made possible by Detective Todd Bernstein, Lieutenant Andres Bilbao, Sergeant Scott Meredith, and their colleagues. Under Captain Geoff Chadwick’s leadership, the AAB is producing compliant audits that the station captains are using regularly to inform station practices. And critical gains in performance mentoring were led by Captain Shawnee Hinchman and Lieutenant Jennifer Roth from RMB and Constitutional Policing Advisor Anne Trembly. Undersheriff April Tardy has led important improvements to the Department’s crime and risk management forums. Importantly, the stations’ community engagement efforts are now connected to a larger, increasingly coordinated community outreach effort by the talented and energetic Lieutenant Melanie Rivers.

We appreciate Director Eileen Decker for her tireless efforts in the Office of Constitutional Policing and Sheriff Robert Luna for his unwavering commitment to LASD deputies, the community, and fair and constitutional policing practices.

We also acknowledge the deputies who serve and protect the community every day while also undertaking the hard work of organizational change.

Finally, we also appreciate the engaged community members in the AV, particularly the Community Advisory Committees (CACs). We acknowledge that while our assessment of LASD’s practices is improving, more work is needed to build trust with the community. The current members of the CACs and the Youth Council are engaged and committed. We acknowledge your hard work and dedication.

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 virtual meetings with the Parties (LA County, LASD, and DOJ), the CACs, and community members; participated in site visit meetings at the Hall of Justice and at the AV stations and in numerous smaller in-person meetings, including with Sheriff Luna and the director of the Department's OCP; participated in ride-alongs and roll call briefings and trainings; engaged in ongoing telephone and electronic communications with the 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.² Further examples of the specific activities undertaken for various sections of the SA are provided below.

1. Stops and Bias-Free Policing

- Met and regularly communicated with LASD AAB to review and provide several rounds of feedback on AAB stops audits.
- Reviewed LASD's verifications of attendance at roll call trainings and full-day training sessions for the second and third quarters of 2024.
- Regularly met with LASD staff to provide feedback and technical assistance (TA) on the development of their new online stops and risk management dashboards and other data issues.
- At the request of LASD, evaluated and provided feedback on training documents and outside training resources for the Department.
- Met with LASD training leadership and established the process for Parties to track the development and approval of training being offered for SA compliance.
- Continued to provide TA to LASD regarding crime prevention strategies by reviewing documents, providing feedback, and meeting with station captains.
- For each station, participated in monthly meetings with the Center for Policing Equity (CPE) and began review of the results of CPE's analysis of AV policing data.
- Conducted ride-alongs, met with supervisors at the stations, and attended community meetings in the AV.

² See the Monitors' previous semi-annual reports and, in particular, the [15 Semi-Annual Report, Appendix D Only.pdf](http://www.antelopevalleysettlementmonitoring.info/), under Documents and Reports at our website, Monitoring of the Antelope Valley Settlement Agreement (<http://www.antelopevalleysettlementmonitoring.info/>) for more detailed information about the work history for each SA paragraph.

2. Community Engagement

- Maintained consistent contact with CAC members and other community members.
- Met with CAC members to provide guidance and clarification on the SA and their roles.
- Reviewed AV stations' crime prevention strategies, along with other documents and reports.
- Observed presentations by the OCP on community engagement activities and plans.
- Attended CAC, town hall, and other community meetings.
- Met with LASD leadership regarding the CACs and community engagement activities.
- Attended and provided feedback to the Department on the Crime Management Forum (CMF) and Risk Management Forum (RMF).
- Reviewed documentation, observed presentation, and provided feedback on LASD's plan to revamp the CMF and RMF.
- Began review of the Department's proposed Community Engagement Training, Guidebook, and revised attendance plan.

3. Use of Force

- Met with and collaborated with AAB staff in the development of a series of mini use-of-force (UOF) audit workplans.
- Consulted with AAB staff and provided technical assistance with three AV mini use-of-force audits that were in process.
- Reviewed three AAB use-of-force audit reports and provided feedback.
- Virtually attended NPD Category 2 use-of-force reviews.
- 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.
- Consulted with the Compliance Unit to identify the audit population and received related materials for an AV use-of-force audit.
- Prepared and submitted a draft use-of-force audit workplan to the Department and DOJ, which they reviewed and approved.
- Initiated a Palmdale and Lancaster use-of-force audit.
- Attended and assessed the Department's initial Taser 10 training.
- Met virtually with DOJ and the Department's Taser 10 training personnel.
- Attended and assessed the Department's updated Taser training.

4. Complaints

- Met and worked with AAB and the Compliance Unit on numerous occasions to refine AAB's complaint audit work plan for 2024.

- Worked with AAB to refine its audit strategy, which focused on targeted audits, providing station captains with more timely feedback.
- Reviewed individual work plans for several AAB complaint audits and reviewed the draft reports for those audit findings.
- Reviewed AAB's three comprehensive end-of-year complaint audit reports and coordinated feedback with DOJ.
- Monitored LASD's processing of several community complaints, which were brought to our attention by community members.

5. 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.
- Continued to work with the OCP, RMB, and the commanders who form the Performance Mentoring Program (PMP) Panel on revising the PMP program.
- Reviewed and commented on five draft directives developed to guide the new PMP process.
- 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

LASD and the AV stations have demonstrated considerable progress in the areas of stops, searches, and seizures. The station captains are emphasizing more attention be devoted to SA-mandated practices, including procedural justice, constitutional policing, and bias-free policing, and ensuring station staff understand what is expected of them and then holding them accountable. The AAB audits and the newly implemented dashboards are of particular help here in reinforcing these changes.

Changes in compliance assessments in this reporting period include the following.

- LASD has achieved partial compliance with five stops-related provision (SA Paragraphs 51, 55, 56, 58, and 62).
- LASD has achieved compliance with two provisions where they were previously in partial compliance (Paragraphs 42 and 52b).
- LASD is now in *sustained* compliance with two additional provisions (Paragraphs 41 and 43).

1. Training Delivery

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 be in sustained compliance for providing the full-day constitutional policing training during this period for LASD-AV deputies and embedded units.³ The training attendance information provided by LASD on August 20, 2024, again placed the Department above the 95% threshold needed for compliance with this provision.⁴

b. *Quarterly Refresher Roll Call Training*

- The Department is in compliance with the roll call training for 2023 (SA Paragraph 71) and continued to provide this roll call training to deputies in the first, second, and third quarters of 2024.

LASD remains in 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 is provided quarterly but assessed for compliance on an annual basis; therefore, compliance for 2024 will be measured in the next reporting period. When LASD completes the required roll call training for the fourth quarter of 2024, they can reach sustained compliance for the delivery of this required training. The Parties have agreed that the roll call trainings need to be updated because the materials and scenarios used have not been updated since they were approved in 2019. That update will be part of training discussions in the next reporting period.⁵

³ 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.

⁴ To ensure training takes hold and is reflected in routine practice, it is important that the principles taught are reinforced at the stations, that deputy activities are reviewed for alignment with the training, and that supervisors are held accountable for monitoring deputy behavior and providing corrective action when needed. Station captains have been receptive and addressed concerns directly with their staff, including command staff, lieutenants, supervisors, and line deputies.

⁵ 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. For SA-required trainings currently in compliance, as long as LASD continues to deliver the course and continues to assess and, as appropriate, revise trainings when audits, data analysis, or other reviews indicate that the course may have shortcomings, they will maintain compliance.

c. Procedural Justice Training

- LASD is now in compliance with SA Paragraph 42.

In September of 2023, the MT published an audit finding that deputy conduct in the field did not reflect the basic tenets of procedural justice laid out in Paragraph 42.⁶ AAB mini-audits in early 2024 found similar results, but subsequent AAB mini-audits in this reporting period found significant improvement. Additionally, in observation and review of related materials, the MT has evidence that AV station leadership is now consistently holding deputies accountable for following the tenets of this procedural justice training and holding supervisors accountable to ensure LASD deputies treat people in the community consistent with the principles of procedural justice. Accordingly, the MT has found the Department in compliance with Paragraph 42.

To reach one year of sustained compliance with this paragraph, the MT will not require perfection; rather, the MT expects (1) continued inclusion of procedural justice principles in LASD training, (2) continued AAB reviews of stops assessing compliance with the provision, and (3) continued focus of the AV station captains on accountability for staff to follow the principles of procedural justice.

d. LASD Training Bureau Update and Consultation with External Experts

The MT met with the two Training Bureau captains twice during this reporting period, in August and September 2024, to discuss LASD training efforts. In those meetings, the training captains expressed a commitment to providing fresh, relevant, and effective training on constitutional policing, bias-free policing, revised use-of-force training, and ongoing professional training for LASD deputies. Significantly, LASD intends to implement these best practices Department-wide instead of restricting them to the AV stations.

Engagement with outside experts and trainers is critical to ensure LASD remains aware of national best practices. LASD is currently considering outside vendors to provide regular training briefings and other support. Whether or not LASD ultimately chooses to move forward with those training vendors, the MT applauds the Department for considering ways to leverage outside resources to meet the training needs of deputies.

In the previous reporting period, the MT attended the “Why’d You Stop Me” (WYSM) training for LASD deputies. The training is provided by an outside group of expert trainers in the topics of procedural justice, deputy wellness, and maintaining professionalism in contact with the community. The training emphasizes the importance of the police profession and the need to maintain the highest commitment to ethical standards. LASD has indicated they will look to schedule additional sessions for Department

⁶ SA Paragraph 42 states: *LASD agrees to incorporate the following elements in its training of Antelope Valley deputies: (1) introducing themselves at the initiation of contact with a civilian when reasonable and practical; (2) stating the reason for an investigatory stop or detention as soon as practicable; (3) ensuring that an investigatory stop or detention is no longer than necessary to take appropriate action; and (4) acting with professionalism and courtesy throughout the interaction.*

staff. While WYSM alone does not meet SA training provisions, the MT and DOJ support its use as part of a package of training.

LASD has continued their engagement with 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). In April 2024, CRI-TAC training experts conducted a limited review of certain LASD courses. The results from the CRI-TAC review were expected in this reporting period; LASD now expects to receive CRI-TAC's recommendations early in the next reporting period. LASD indicated the recommendations will be reviewed by Sheriff Luna and then the Department will move forward with the implementation of key recommendations for the PSP training evaluation. The MT looks forward to receiving the final report, reviewing the recommendations, and learning what the Department's priorities and plans are relative to the implementation of those recommendations.

e. Supervisor and Management Training

Over the last few years, the MT has provided case reviews to LASD to highlight cases in which problems with deputies' stops-related activities and documentation were not addressed by supervisors or commanders. Part of this issue can be corrected through effective accountability practices, which will be discussed later in this report, but LASD has also committed to enhancing training for supervisors and managers. The supervisor and management trainings discussed here are not required by the SA and did not go through the SA training approval process; however, they illustrate LASD's efforts to provide professional development for captains.

As we discussed in the last semi-annual report, LASD has redesigned its basic supervisory course, which all newly promoted sergeants must attend. The training emphasizes 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. Increasingly, AV station captains are holding supervisors more accountable for quality supervision by having managers more thoroughly review their work and instituting new tracking mechanisms to ensure administrative paperwork is submitted as required by policy.

Additionally, LASD provides all newly promoted captains with a dedicated five-day training on essential skills to be successful in their jobs, such as leadership skills, budgeting, and supervision and management concepts. The Office of Constitutional Policing assigned an experienced law enforcement leader to assess that training and oversee the implementation of improvements to the curriculum to reflect the current administration's higher expectations for accountability. As part of the revised course, the AV captains are tasked with speaking to each class about the new processes in the AV for accountability and supervision.

The OCP has also identified external executive training and professional development opportunities to further develop command staff and expose them to best practices in the industry. LASD has continued to send managers, lieutenants and above, to these training sessions, including courses and sessions offered by groups such as the Police Executive Research Forum (PERF), the FBI's National Academy (NA), Law Enforcement Executive Development Seminar (LEEDS), the DC Police Leadership Academy, the California Police Chiefs Executive Training program, and the Peace Officers Standards on Training (POST) Command College, among others. Doing this signals an increased awareness and commitment

by 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. Constitutional Policing—Changes in Compliance Status

Compliance status has changed for a number of stops-related provisions. Factors contributing to MT determinations of compliance include the MT stops audit, the AAB audits (see below), and MT observations and reviews of case files over the past years.

- LASD is now in sustained compliance with SA Paragraph 41.

The MT stops audit published in September 2023 found LASD in compliance with the requirement that deputies conduct stops only when reasonable suspicion is present. Since the audit, the MT has not observed any patterns of deputies failing to have reasonable suspicion to conduct a stop. The AAB audits further confirm this finding. Additionally, the AAB did not find instances where deputies failed to have a lawful reason for the stop. Given these factors, the MT finds LASD in sustained compliance with Paragraph 41 of the Settlement Agreement.

- LASD is now in sustained compliance with SA Paragraph 43.

Additionally, Paragraph 43 of the SA states: "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." The MT audit in September 2023 found LASD in compliance with the requirements of this provision, as did the AAB interim audit. Additionally, as part of audits for other SA stops provisions, LASD did not find instances or notice a trend where deputies failed to have a lawful reason for the stop. Given these factors, the MT finds LASD in sustained compliance with Paragraph 43 of the Settlement Agreement.

3. Body-Worn Camera Policy and Reviews

The SA requires weekly review of deputy stops by their supervisors. DOJ, MT, and, more recently, AAB reviews and audits have shown that the LASD practice of reviewing only stops data and reports, but not BWC footage, is insufficient to identify cases out of compliance with LASD policy and SA provisions. BWC review is not yet a standard part of regular supervisory review of deputy stops. Unfortunately, LASD's current BWC policy precludes random reviews of BWC footage by supervisors.⁷

⁷ LASD currently conducts BWC reviews in many instances, including as part of investigations of use of force and complaints and other administrative investigations. AAB auditors use BWC footage extensively. LASD station supervisors conduct limited reviews of footage to determine whether deputies had their BWC activated throughout a stop.

In revisions to its proposed new BWC policy, LASD provides supervisors with the ability to randomly use BWC footage to review the stops of deputies. The MT and DOJ provided LASD with additional feedback on the draft policy in July 2024. The policy is now in the “meet and confer process” with the labor organizations. The MT will closely monitor the progress on this important policy revision.

4. Use of Data at the AV Stations

- The Department is not yet in compliance with the 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 has had difficulty achieving 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 here 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.

LASD has made significant progress in creating dashboards both for use by the public and by LASD leadership and station managers and supervisors. The new dashboards have helped the Department take further steps toward compliance with several SA paragraphs where compliance depends on the analysis and application of data.

a. Public and Internal Data Dashboards

External Dashboards and Transparency

To date, LASD has published the following public dashboards for the AV and County of Los Angeles: (1) Racial and Identity Profiling Act (RIPA) (i.e., Stops), (2) Sworn Personnel Complaints, (3) Taser Deployments, (4) Police Force Statistics, and (5) Crime Statistics.⁸ Updated every 24 hours, the dashboards provide the community with virtually real-time reporting about LASD activity in the AV and across the county. Users can find their city or area and filter by data categories depending on their topic of interest. In addition, the Stops dashboard includes a mapping capability to view the concentration of stops in an area. LASD maintains the dashboards for public use, underscoring a commitment to transparency with the community. The data on the public dashboards is the same as that used internally by the Department except that, in accordance with California law, the public dashboards do not include confidential information by which members of the public or the Department might be identified.

⁸ The dashboards can be viewed at <https://lasd.org/transparency/>.

Internal Dashboards

To date, the AV captains have the following dashboards available to them to help manage their stations:

Administrative and Reporting: (1) crime report completion, Sheriff's Automated Contact Reporting System (SACRS, a.k.a. RIPA) compliance, body-worn camera compliance; (2) risk management data tracking (Performance Recording and Monitoring System, or PRMS); (3) overdue crime report completion by deputies; (4) overdue use-of-force and complaint investigations; and (5) overtime worked report.

Analytics Reports: (1) internal stops report and deputy productivity, (2) performance oversight information tracker (POINT), (3) force statistics, (4) traffic collision statistics, (5) crime statistics.

Miscellaneous Reports: (1) body-worn camera dashboard, (2) firearm statistics compliance.

A collaborative technology team from OCP and LASD's Business Process Improvement Group developed these dashboards and provides LASD staff with training in their use. A PMP application has also been developed (see the Accountability section).

b. Application of Data by Station Managers

The access to significant amounts of timely data available to LASD leadership allows them to assess deputies' activities in the field and to do the macro assessments of crime reduction programs and activities in the AV. The dashboards can help managers to recognize and decipher patterns and trends across individual deputies, units, or the station as a whole and use that information to make any changes to practice indicated by the findings and to inform their crime prevention strategies. The dashboards will also help AV leadership more easily conduct regular reviews of deputy activities and determine whether increased supervision, mentoring, training, or other corrective actions are necessary. This is a significant advancement for LASD and will help facilitate the required tracking, supervision, and analysis required in several SA sections, including Stops, Bias-Free Policing, and Data Collection and Analysis.⁹

⁹ Department data systems need to meet the data collection requirements of SA Paragraphs 44 and 81. The data collected need 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).

In previous semi-annual reports, the MT has provided examples of approaches station managers can use in exploring the findings of their own data analyses or analyses of external entities, such as CPE. We have included three of these in Appendix A of this report.

In the CMF/RMF meetings, the AV station captains have greatly improved the detail and thoroughness of their written presentations and discussions of data and analysis related to particular enforcement efforts in the AV (see also the Community Engagement section). The next step is to further develop, routinize, and document the use of data at the stations in addition to the CMF/RMF process. Captains need to regularly monitor the enforcement activities of deputies to ensure they are in alignment with Department priorities and station expectations and to provide deputies and their supervisors guidance as needed. Additionally, the data should be used to develop and implement assessment protocols to produce the required disparity assessments required by the SA. For the purpose of measuring compliance and, more importantly, ensuring consistency and sustainability at the stations, the captains need to develop consistent, standardized methods for documenting and tracking this work. The OCP and AV captains report they are working on documentation processes that will be used both at the AV stations and countywide.

The Parties and MT will establish a reasonable format for the public reports required by the SA. These reports should not create an undue burden on LASD staff to complete but, at the same time, will require descriptions of the analyses conducted, the data findings, the assessment of those findings by the Department, any corrective action taken, and the outcomes of those actions. Compliance with provisions in the Bias-Free Policing, Data Collection and Analysis, UOF, and Accountability sections will also require the conduct and documentation of similar types of reviews.

5. Modernizing LASD's Stops Data Management Systems

a. *CAD/SACRS Upgrade*

In previous reports and in the MT stops audit published in September 2023, the MT expressed significant concerns with the ability of the Department's archaic computer-aided dispatch (CAD) system to accurately collect the data for stops of persons by deputies in the AV. This resulted in significant problems in trying to understand what took place during the stop. AAB audits have also found CAD shortcomings, and LASD executive leadership has concurred.¹⁰

To address this issue, the LASD technology team determined whether SACRS could be modified to capture additional fields to ensure all the required SA information is documented for each stop. The Department already uses SACRS to collect the state-mandated Racial and Identity Profiling Act (RIPA) stops information, which is a more modern application than CAD. This system can use automated checks to ensure fields are completed properly. Additionally, SACRS can produce information for audit and inspection purposes in a timelier fashion and with a much higher level of data accuracy.

¹⁰ LASD's CAD system malfunctioned and went offline for several days beginning December 31, 2024. Dispatch personnel use CAD to provide detailed information about calls for service and about individuals whom deputies contact in the field. CAD is also the primary way deputies document their field activities.

Importantly, SACRS already captures nearly all the SA-required data. LASD provided the MT and DOJ with a proposal to address the gaps in SA-required data collection and to use the SACRS system to track stops moving forward. On December 19, 2024, the MT and DOJ approved the LASD SACRS proposal. The MT recognizes this took a significant amount of work and applauds the commitment of LASD to find an alternate method to collect stop information in lieu of the antiquated CAD system. We also note that, despite these changes, the existing CAD system remains a significant issue and continues to impede long-term compliance efforts.

b. Exploration of a New Records/Documents 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 supervisory review, data collection, analysis, and reporting needs. LASD continues to use paper-driven reporting, investigative, and supervision systems to document and review deputy activity. As an example of LASD's paper-driven systems, the required weekly Deputy's Daily Work Sheet (DDWS) reviews by supervisors (SA Paragraph 59) is a paper-driven process where supervisors review a printout of deputy stops activity and make handwritten notations regarding their findings. One DDWS review by a supervisor results in a stack of papers being clipped together to then be submitted through the chain of command. Supervisory compliance for conducting the weekly reviews is then manually recorded in a spreadsheet. Such highly manual and paper-driven processes are inefficient and ripe for human error and tracking mistakes. Over the years, the MT has seen several examples of these paper-driven and manual systems failing. This has not only been a problem for the effective review of DDWS forms; it has been problematic for other SA requirements. Other examples include the slow processing of use-of-force reports being completed at the stations, moving through the chain of command, and eventually being manually entered into PRMS. The LASD technology team has developed tracking dashboards whereby station commanders can determine which documents are in process and which are overdue for submission, but this is a stopgap measure.

For the long term, LASD would benefit from having a system to automate much of these processes so supervisors and commanders can spend more of their time focused on the quality of their reviews and investigations. In response to this need for modern systems, LASD continues to work to identify software products to replace and consolidate LASD's reporting systems for training, use-of-force reports, administrative investigations, pursuit reports, and corrective action tracking. A new online reporting system can 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 in the procurement process for a new system. The Department also continues to seek a new records management system and a new CAD system.

The MT remains impressed that, rather than waiting for that system to be implemented, LASD continues to develop its own in-house solutions to many of its data needs such as those represented by the various dashboards and by the new mentoring tracking system (see Accountability).

6. LASD Audit and Accountability Bureau (AAB) Stops Audits

As reported in the last semi-annual report, in May 2024, AAB published an audit of stops titled: “Stops and Detentions Interim Audit, Project No. 2023-7-A.”¹¹ The Interim Stops Audit reviewed 50 stops conducted by LASD deputies in the AV from April 15 through May 15, 2023. The audit found LASD deputies out of compliance for BWC violations and for improper documentation in each of the four audit areas: initiation of stops and detentions, consent searches, probation/parole searches, and backseat detentions. AAB found LASD out of compliance with many of the SA provisions and identified several areas for improvements, such as increased review of BWC footage of deputy stops to ensure actions are lawfully allowed and in compliance with LASD policy.

As a result of the shortfalls in performance identified in the MT audit and the AAB interim audit, the AAB implemented a plan to use mini-audits with small samples looking at stops at the AV stations for the purpose of providing station captains with more timely, actionable feedback regarding deputy compliance with SA items.

The AAB captain continues to provide audit plans and reports for review and comment by the MT and DOJ. MT and DOJ approval of AAB stops audits is not required by the SA, but this is an excellent and useful practice. After considering the MT and DOJ comments, the AAB finalized their audit plans and published their completed audits.¹²

The main objectives of the mini-audits completed in this reporting period included: consent searches, parole/probation searches, domestic violence–related backseat detentions, and the stations’ processes for supervisory review of stops.¹³

LASD reports that the AAB audits will continue even when they find significant improvements in some areas. The AAB has indicated it will continue to focus on key areas where non-compliance or inconsistent compliance occurs. Emphasis will be placed on audit procedures related to objectives that consistently result in non-compliance, ensuring that these areas continue to be thoroughly monitored and addressed.

SA Paragraph 149 gives the Monitors discretion to use AAB audits as factors in the MT’s determination of compliance with SA requirements. We are encouraged by the quality of the audits currently being produced by the AAB for a number of reasons, including the fact that we now have greater confidence in their work and feel increasingly comfortable in using these to support our compliance determinations. We did, in fact, consider AAB audits—along with MT audits and document reviews,

¹¹ Available at https://lasd.org/wp-content/uploads/2024/04/Transparency_Audit_2023-7-A_Stops_and_Detentions_Interim_Audit-_Antelope_Valley_Stations.pdf

¹² LASD AAB audit reports are posted on the Department website at <https://lasd.org/transparency/audit-reports/#2024>

¹³ The mini-audits were as follows: Backseat Detentions (2023-3-A, 2024-10-A), Sergeant Weekly Audits of DDWS Performance Audit (2024-7-A), Backseat Detentions—Domestic Violence Related (2024-12-A, 2024-28-A), Initiating Stops and Detentions—Consent Searches (2024-13-A), Initiating Stops and Detentions- Parole/Probation Searches (2024-14-A, 2024-15-A, 2024-30-A).

observations, discussions with LASD personnel, and other sources of information—in arriving at the compliance assessments described in this report. The complaints audits were of particular assistance in this regard because they follow audit plans approved for the purposes of determining compliance and because MT auditors have reviewed the complaints cases in the sample and have verified the AAB findings. Although not designed to be used in MT compliance assessments, the AAB mini-audits conducted for stops and use of force continue to be vital elements of the Department’s efforts to achieve SA compliance. They are meeting their agreed-upon purpose: They are providing timely and actionable feedback to Department managers while also indicating whether progress is being made toward compliance. In turn, this helps determine whether the additional time and resources required for expanded audits to establish compliance assessment are justified or necessary.¹⁴

LASD has expressed interest in having AAB audits regularly considered in MT compliance assessments for stops, use of force, complaints, and other subject areas. The MT supports this strategy and, when requested, will review upcoming AAB audit plans from that vantage point in order to ensure the population identification, sampling, and review methodologies used can support that purpose. In other words, we will conduct the same level of review applied to the MT compliance audit plans.

a. AAB Stops Mini-Audits

For the stops audits, AAB reviewed CAD reports, incident reports, Deputy’s Daily Work Sheet (DDWS) supervisory review forms, other documentation, and BWC footage for each AV stop sampled. In addition to the main objectives of the audits, while reviewing the BWC footage, AAB also assessed whether AV deputies activated their BWCs for the entire stop, treated members of the public professionally, introduced themselves to the community member at the beginning of the stop, and provided the reason for the stop.

The first set of mini-audits released in this reporting period showed the AV stations continued to have low levels of compliance with the SA stops provisions. Feedback was provided to station captains and improvements were made. As a part of the improvements, the station managers worked to ensure that station supervisors provide deputies with any needed extra reminders, training, supervision, or mentoring that may be needed to correct issues identified in the mini-audits. A second set of mini-audits showed significant improvement in compliance. However, if subsequent audits show the problems persist, station managers may pursue stronger corrective action, including PLEs, PMP, or discipline.

¹⁴ Among the factors the Parties will discuss regarding adjustments to the mini-audit work plans in order to purpose them for the MT’s assessments of compliance include sample size, sample selection procedure (e.g., purposeful versus random), shortcomings of combining independently drawn samples, and others. We will also discuss reconciliation of data sources to improve population identification, overall data accuracy and reliability, the use of SACRS data when appropriate, and MT verification of findings.

b. AAB Supervisory Review Mini-Audit

In addition to the mini-audits above, the AAB conducted audits of AV stations to determine compliance with the supervisory and management requirements of the review of stops, in particular SA Paragraphs 58–63, which address the types of regular reviews supervisors and managers need to conduct to ensure deputies' actions during stops are in accordance with the law, LASD policy, and the SA.¹⁵ The AAB found many of the shortfalls in compliance were still present, as they had been in the MT's 2023 audit. AAB identified shortcomings and steps that still needed to be taken to comply with SA provisions and LASD policy, including the following.

- Supervisors were not always providing the required level of weekly review of DDWSs for AV deputies' stops.
- When an error was found in the CAD entry by supervisors, the deputies were notified by supervisors, but corrections were not made in the CAD system.
- There were shortfalls in some of the review processes for the DDWS reviews.
- There was a need for a number of system improvements to ensure the required reviews took place.
- CAD had significant shortfalls in recording data for the stops, and the auditors suggested LASD look into using the SACRS system to document stops moving forward.
- The stations need to establish stronger management controls to ensure consistent compliance and create a way to track repeated violations during stops by LASD deputies.

As a follow-up to their audit, the AAB worked with AV station captains to address the supervision issues identified. The MT has observed that station captains respond proactively to AAB audit findings and to implement course-correcting solutions.

7. LASD Management Increased Involvement and Oversight

- The Department is now in partial compliance with SA Paragraphs 58 and 62, but out of compliance with the other supervisory and management review paragraphs in the Stops section (SA Paragraphs 59, 60, 61, 63).

Two of the supervisory review provisions have reached partial compliance, which is an important sign of progress. And recent AAB audits have found improvement, especially in Palmdale, with regard to the management and supervisory review requirements of the SA. Nevertheless, greater emphasis has to be placed on this area. The station captains have made many improvements to these processes—they are certainly on the right track toward compliance—but those efforts have not consistently translated into the intended outcomes across both stations. Compliance will require a routinization of the processes,

¹⁵ The audit can be viewed at <https://lasd.org/transparency/audit-reports/#2024>.

documentation of reviews and actions taken, and audits showing increased compliance with the individual provisions.

Having said that, the station captains have demonstrated impressive commitment to emphasizing management reviews and accountability processes. During the quarterly site visits and monthly virtual check-ins, the AV station captains have provided the MT and DOJ with detailed updates on their efforts and progress related to the SA, including increased supervision and management at the stations. This marks two consecutive reporting periods where the MT has observed the station captains make concerted efforts to prioritize bias-free and constitutional policing principles in their messaging to staff. LASD's efforts observed, shared, and discussed over the past year have included the following.

- Providing increased oversight of supervisors and lieutenants to ensure they conduct quality and timely reviews of deputies' work.
- Tracking the timeliness of investigations such as Service Comment Reports (SCRs) or those for uses of force.
- Addressing the shortfalls identified by AAB mini-audits.
- Implementing new processes to ensure stops receive the necessary level of scrutiny and review. The captains have required the lieutenants to track the reviews more closely, and the reviews are tracked by the captains' administrative staff.
- Using the various internal dashboards to conduct their own reviews of deputy adherence to these principles.
- There have been instances where the station captains have talked directly with deputies about the need for positive interactions with the community and, when appropriate, the need to use crime response strategies other than overly relying on enforcement activities because that can negatively impact LASD's relationship with the community.
- Captains have been spending more time in direct contact with staff at all levels, ensuring clear and consistent messaging of station priorities and expectations.
- The MT is aware of instances where the station captains increased monitoring and mentoring for supervisors who were not completing work in a timely fashion or meeting policy expectations.
- In a few instances, the captains reassigned or transferred staff who could not meet the expectations set by commanders.
- The four captains stay in regular communication with one another in order to increase consistency in processes and expectations among staff at the two stations and in the law enforcement services provided to the AV community.

During site visits, LASD sergeants and deputies noted the increased involvement of the station captains. The MT notes that when LASD deputies observe a consistent presence and engagement from station captains, it reinforces the message that LASD is prioritizing increased accountability and adherence to LASD policy.

8. Crime Prevention Strategies

In this reporting period, the AV operations captains made significant progress on written crime reduction plans that will provide guidance on prioritized goals for each station. Crime prevention strategies are required by existing Department policy (3-01/110.00—Community Policing and Engagement) and the SA.¹⁶ As of the time of the writing of this report, the plans are in draft form and have been shared with the MT for a couple rounds of review and feedback. At present, their plans each address a specific problem for the station (grand theft auto in Lancaster and traffic collisions in Palmdale).

The Palmdale station intends to conduct meetings every two weeks with investigative and patrol leadership at the stations to discuss their progress on the priorities identified as part of the strategic plan, and sergeants will brief deputies in patrol. Additionally, the Palmdale station created an electronic form (the Shift Recap Form) for use by anyone working at the Palmdale station to track their efforts toward the crime reduction or community engagement priorities of the station. The Lancaster captains report they intend to establish a similar method to track these activities. Both station operations captains will provide their CACs and other community groups with updates on the progress of their crime reduction efforts.

To inform their crime reduction plans, the AV stations are making a concerted effort to gather feedback from the community via multiple avenues, including through community meetings and through informal surveys of the community. Of note, the Palmdale station has also created several min-surveys (via QR code link) with a limited number of questions that can be completed quickly by community members. The Lancaster operations are not as far along as the efforts in Palmdale, but reports working to implement mini-surveys and set up regular meetings with staff to track progress on their crime reduction efforts.

The formalization of these strategic plans represents significant progress as they are necessary to determine whether deputy stops activities are in line with the articulated priorities of the station captains. In regular updates at the stations and in other forums like the CMF/RMF, the strategies can be assessed for effectiveness and for impacts to the community and neighborhoods where the enforcement is taking place. This alignment is critical to assess if the organized efforts of LASD are leading to enhanced public safety and productive relationships with the community.

a. Use of SARA Process

Problem-oriented policing and the Scanning, Analysis, Response, and Assessment (SARA) model should play a large role in carrying out the stations' strategic plans. The MT observed the SARA process used in

¹⁶ The preface to the Stops section 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).

the CMF/RMF presentations on September 24, 2024, to discuss issues facing the stations. The depth and extent of the application of SARA, when used, has improved. The plans described contained much of the information needed to complete a SARA problem-solving project; as a next step, LASD needs to implement a consistent document or format to use to track SARA projects. Please see the Monitors' 18th Semi-Annual Report for a detailed description of the SARA model and recommendations for use.

LASD must establish routine engagement with and analysis of available data, and station application of the SARA model will help standardize and document those efforts. This should be a key element of station managers' development of and assessment of crime prevention strategies. LASD has included a discussion of the SARA process as part of their CMF, and the MT will observe how LASD incorporates the use of SARA in station enforcement efforts.

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 the causal factors and to reduce or eliminate them to the extent possible.¹⁷

b. Steps to Compliance for Crime Prevention Strategies

Compliance in this important area is within reach for LASD. To reach compliance LASD will need to do the following.

- Implement the stations' crime reduction strategies/plans.
- Document the use of data to assess the effectiveness of the crime reduction efforts, as well as any possible negative impacts of the enforcement tactics on the community, including potential disparities.
- Implement a system of regular check-ins with staff and with the community to receive progress reports, document lessons learned, revise the plans as appropriate, and coordinate efforts moving forward.
- Either in a written report or part of the CMF/RMF, provide regular reports to the North Patrol Division Chief on the progress and impacts of the crime reduction efforts in the AV.

¹⁷ See the Crime Prevention Strategies box in the Stops section of the 18th Semi-Annual Report, 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" (p. 17).

Note the use of problem-solving and community policing approaches are primarily assessed as part of the Community Engagement section of the SA.

9. Successes and Obstacles

LASD has made significant progress with data collection and the incorporation of the data into dashboards that can be used by LASD and AV station leadership to monitor enforcement stops in the AV.

The two-captain model continues to greatly enhance the Department's progress toward SA compliance and toward providing the best policing services possible to the AV community. The model affords AV captains more direct contact with and opportunities to provide feedback to staff at the station level on a daily basis. With one captain primarily responsible for patrol operations and the other focused on overseeing risk management issues, having two captains at each station has helped bring about a significant reduction in the backlog of required reports, including use of force and complaints investigations, and other required administrative work. The model—especially with the particularly deliberative as well as collaborative approach of the four captains currently assigned in the AV—coupled with the active support and guidance of NPD managers has allowed for more uniform processes and messaging across the stations. This helps deputies have a clear understanding of how to perform their duties and helps provide consistent and higher-quality law enforcement services to all members of the AV community. The AAB audits showed improvement in deputies adhering to LASD policy during stops and in thoroughly entering stops information in CAD, and the captains continue to use AAB audit findings to inform and improve station practice. It is a testament to the commitment of the current captains and the success of the two-captain model in AV that captains from other stations request consultation on adopting some of the same practices at their stations.

As discussed earlier in this report, LASD continues to struggle with old technology. The archaic CAD system has severe limitations of the type, amount, and accuracy of data. For tracking stops, LASD creatively explored the use of the SACRS system to track stops, which would eliminate the need to track stops in CAD for SA purposes. Additionally, LASD is working to identify a vendor to replace their records management system (RMS) and to acquire a new reporting system to complete administrative reports, such as use of force, pursuits, and complaints. In the meantime, however, the current CAD system and issues with reliability of the data it holds is a major obstacle and impediment to improving organizational performance or achieving compliance with the SA.

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

The AV station captains need to finalize the documentation of their crime prevention strategies and communicate those plans throughout the stations so staff clearly understand what strategies the station intends to carry out and what their role will be. Additionally, LASD will need to document the work conducted and outcomes. This can be done in a variety of ways, such as on SARA forms or in follow-up notes or memos from regular meetings with staff. Although there is no SA requirement for how crime plans are documented and tracked for the stations, it is advisable for LASD to standardize the process across AV stations. This will make it easier for deputies who move between stations to understand the

expectations of the station leadership and easier for leadership at the division level to monitor the work being done at the stations.

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. LASD needs to assign staff to create and implement a plan to meet the requirements of this provision.

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. 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. Random audits by supervisors are a best practice in law enforcement, and numerous cases have been brought to LASD managers' attention that show 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 specifically identify BWC videos (because it was drafted and signed before BWCs were implemented in the Department).

10. Next Steps

a. LASD

- Finalize the BWC policy.
- AAB will continue to provide the MT with the audit protocols prior to beginning an audit and the completed stops audit reports. The audits will be posted on the LASD website for transparency.
- Refine and implement the crime prevention strategies at the AV stations.
- 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.
- Provide additional training to managers and supervisors in the use of the new stops dashboards. Ensure new managers and supervisors assigned to the AV stations receive the necessary training to use the dashboards.
- Develop a process whereby station managers and supervisors consistently conduct the stop reviews required under Paragraphs 58–63. Then develop related training for managers and supervisors.
- Complete the discussions regarding the use of SACRS as a replacement system for CAD to capture data related to stops and implement the changes.

- 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 further reports completed by CPE and inform us of plans for future work.
- Review and implement CPE recommendations as determined to be appropriate and agreed to by the parties.

b. The MT

- Complete a focused review of the work of the Parole Compliance Team who conduct stops and enforcement in the AV and provisions not addressed in the MT stops audit, particularly home-based searches.
- Provide timely reviews and feedback on documents submitted by the Department to the MT.
- Provide technical assistance on the implementation of crime reduction strategies in the AV and the use of data to assess the effectiveness of the strategies.
- 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.

11. 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	Yes
	Notes: The MT 2023 stops audit showed the Department is in compliance with this provision and with Paragraph 43. The MT audit, AAB 2024 mini-audits, and other MT reviews have found no issues with this provision or with Paragraph 43. See the discussion text for a more detailed discussion of compliance. 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	Yes 12/24	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. The MT audit and the first round of AAB mini-audits found poor results for this provision, but the second round of mini-audits later in 2024 found significant improvement. See the discussion text for a more detailed discussion of compliance.				
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	Yes 12/24
	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 LASD AAB mini-audits have shown improved compliance with stops in CAD, but the structural shortfalls of CAD to accurately document stops cannot be overlooked. The LASD proposal to switch to SACRS was approved by the MT and DOJ during this period; this will significantly assist LASD in collecting accurate data. The accuracy and thoroughness will need to be assessed. MT will work with AAB to assess this in the next reporting period.				
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 significant progress by creating dashboards for the AV commanders to monitor the use of parole and probation searches. The MT has seen evidence of AV commanders discussing this information in management meetings. This is a meaningful first step, but this paragraph requires a specific analysis of the efficacy and impacts of probation and parole tactics on the community. To achieve compliance, LASD will need to provide documentation that stations are analyzing the efficacy and impacts of probation and parole tactics in meaningful ways.				

TABLE 1					
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SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
47	Backseat detentions require reasonable suspicion and reasonable safety concerns.	Yes 05/15/17	Yes 08/16/18	Partial	No
	Notes: The MT stops audit showed the Department is in partial compliance with this provision with regard to implementation. AAB mini-audits and found improvement on the part of LASD-AV deputies as well as fewer BSDs overall. MT and AAB audits reviewed CAD data, BWC footage, and written reports for their audits of BSDs. Identifying samples of cases involving BSDs was primarily done using CAD; unfortunately, CAD currently cannot reliably identify all stops and calls for service that involve a BSD. The LASD proposal to switch to SACRS was approved by the MT and DOJ; this and other steps AAB takes to verify the data will significantly assist LASD (and the MT) in collecting accurate BSD data. However, the CAD system will remain essential for capturing details such as calls for service information or other data not recorded in SACRS. The MT will work with AAB to further assess this provision in the next reporting period. (Related outcomes are addressed in Paragraphs 48 and 49.)				
48	Backseat detentions are not conducted as a matter of course during routine traffic stops or domestic violence situations.	Yes 05/17/17	Yes 08/16/18	No	No
	Notes: The MT stops audit showed 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. The AAB conducted mini-audits of stops involving a BSD and found improvement on the part of AV deputies. The audit sample was identified using CAD. See paragraph 47 above for more information.				
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 2023 stops audit due to the Department's insufficient data, because LASD did not track when supervisors are requested to come to the scene when a person complains about a BSD. The Department has a method for tracking complaints arising in the field, but is developing a method for more reliably tracking complaints related to BSDs, which will facilitate future audits. See paragraph 47 above for more information.				
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 (e.g., home-based probation or parole searches). The findings show the Department had 100% compliance for consent searches as related to this paragraph; however, the MT was unable to assess the other types of searches. AAB mini-audits have assessed this provision with regard to consent searches and to probation and parole searches but not for all discretionary searches. LASD must implement a way to track when these instances occur in order to facilitate audit population sampling.				

TABLE 1					
STOPS, SEIZURES, AND SEARCHES COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
51	Deputies do not conduct arbitrary searches.	Yes 05/17/17	Yes 08/16/18	Partial	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 insufficiencies in the data, primarily because CAD can only list a single search reason so all consent searches cannot be reliably identified and not all types of searches are included, e.g., home-based searches. The MT finds partial compliance due to the Department's efforts to improve the reliability of the stops data and due to the AAB mini-audits having found improved compliance as it relates to deputies' requirements for consent searches.				
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 AAB mini-audits have found improved compliance as it relates to deputies' requirements for consent searches, but the MT continues to have structural concerns regarding CAD's ability to capture all consent searches. See also paragraph 7 above.				
52b	Individuals with limited English proficiency (LEP) are informed in an appropriate non-English language.	Yes 04/08/18	Yes 08/17/18	Yes	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 compliance based on previous complaint reviews, ride-alongs, and community input. Moving forward, better tracking of instances where translation services are requested in the field would facilitate more efficient monitoring of this provision.				
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 MT has not observed instances of home-based consent searches, but LASD does not track when there are instances of these searches. The parties will meet in the next reporting period to determine a path forward for compliance. The delivery of the training is measured in SA Paragraph 57.				

TABLE 1					
STOPS, SEIZURES, AND SEARCHES COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
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 MT has not observed instances of home-based consent searches, but LASD does not track when there are instances of these searches. The parties will meet in the next reporting period to determine a path forward for compliance. 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 the subject of search, is subject to detention or search and for how long they are detained.	Yes 05/03/16	Yes 08/16/18	Partial	No
	Notes: MT determines LASD to be in partial compliance because in 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 MT has not observed instances of home-based consent searches, but LASD does not track when there are instances of these searches. The parties will meet in the next reporting period to determine a clear path forward for compliance. 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	Partial	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 MT finds partial compliance due to AAB mini-audits finding improved compliance as it relates to deputies’ requirements for consent searches and because the MT has noted the pre-search knowledge of probation or parole status for home-based searches related to probation or parole checks.				
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.				

TABLE 1					
STOPS, SEIZURES, AND SEARCHES COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
58	Additional accountability and supervision to ensure unlawful stops and searches are detected and addressed.	Yes 05/03/16	Partial	Partial	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. A recent AAB mini-audit of the requirements for this provision found significant shortfalls. As noted in other sections, the MT has serious concerns about LASD’s use of CAD data as the primary source to audit deputy stops. 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. A recent AAB mini-audit of the requirements for this provision found significant shortfalls. The LASD proposal to switch to SACRS was approved by the MT and DOJ during this period; this will significantly assist LASD in ensuring stops reports will be consistently tracked and available for review by supervisors.				
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. A recent AAB mini-audit of the requirements for this provision found significant shortfalls. The AAB reported the station commanders have instituted new processes and oversight to ensure these provisions are followed by supervisors. As noted in other sections, the MT has serious concerns about LASD’s use of CAD data as the primary source to audit deputy stops. The LASD proposal to switch to SACRS was approved by the MT and DOJ during this period; this will significantly assist LASD in ensuring stops and searches will be consistently tracked and available for review by supervisors.				
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. The AAB found improvement at one of the AV stations, but shortfalls remain. See the discussion in the AAB audits section of this report.				
62	Supervisors and station commanders track repeated violations of this SA and take corrective action.	Yes 05/03/16	Partial	Partial	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. AV station captains have been providing leadership and clarity about their expectations for LASD-AV deputies. The MT has suggested LASD determine a uniform way to track repeated violations of SA provisions and the corrective action taken as a result.				

TABLE 1					
STOPS, SEIZURES, AND SEARCHES COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
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. A recent AAB mini-audit of the requirements for this provision found significant shortfalls. See the discussion in the AAB audits section of this report.				

C. Bias-Free Policing

In this reporting period, the Department's efforts regarding the SA provisions related to bias-free policing took steps forward, especially regarding data analysis and review. (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.) Compliance status changed on two provisions.

- LASD achieved compliance with SA Paragraphs 65 and 66.
- LASD achieved partial compliance with SA Paragraph 68.

1. Training

a. *Bias-Free Policing Training*

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

LASD continued to be in sustained compliance for providing the full-day bias-free policing training during this period for LASD-AV deputies and embedded units. The training attendance information provided by LASD on August 20, 2024, again placed the Department above the 95% needed for compliance with this provision.¹⁸

b. *Quarterly Refresher Roll Call Training*

- The Department was in compliance with roll call trainings for 2023 (SA Paragraph 71) and provided this roll call training to deputies in the first, second, and third quarters of 2024.

LASD remained in 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; compliance for 2024 will be measured in the next reporting period.

¹⁸ 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.

c. Training Updates

LASD has worked to identify and implement revisions to its trainings in response to the findings of MT and AAB stops audits. The Department will also need to assess CPE's data analysis of potential disparities in stops and use of force, identify any concerning findings, and consider whether any related changes are needed in the full-day or refresher trainings (along with any other elements of practice) to ensure that deputies are receiving the guidance they need to consistently conduct bias-free policing in the AV.¹⁹ Also, Paragraph 65 requires LASD to consult with experts on stereotypes or bias and ensure LASD provides clear guidance to AV deputies on influences of bias and stereotype threat. See the Stops section for further discussion of efforts by LASD to assess and enhance trainings.

2. Improved Use of Data and Assessment for Disparities

- The Department is in partial compliance with the disparity review of their programs, initiatives, or activities for possible disparities (SA Paragraph 68).

As is elaborated in greater detail in the Stops section, station managers are beginning to use the dashboards to assess the performance of units and deputies, including with regard to race and ethnicity of individuals contacted during stops. This is a significant step forward for LASD and was not possible last year. The AV station captains have received training on the data and have begun to use the dashboards in their efforts to assess crime reduction efforts and the enforcement activity of staff. As it relates to stops and bias-free policing, the AV captains primarily reported using the dashboards to gain a better understanding of the number and extent of enforcement activities conducted by AV deputies. The dashboards were also used in the new CMF/RMF to focus on deputy enforcement activities and patterns. For example, the station captains report that they have used the dashboards to identify which deputies conduct consent searches at a high rate and then hold discussions with those deputies to examine why, and captains reminded these deputies of their overall objectives and not to rely overly or too narrowly just on enforcement tactics because this can have a negative impact on the relationship with the community. For instance, the captains have reminded deputies that consent searches can be used, but they should also look for other lawful reasons to conduct a search when criminal activity is suspected. The captains reported having similar conversations about the use of BSDs with deputies identified as involved in high rates of consent searches and BSDs. In some cases these deputies are also engaged in the department's performance mentoring process, and the conversations and guidance are documented as a part of that process.

The captains have not yet used the dashboards to identify and address specific enforcement patterns in the AV that may indicate disparity in programs, initiatives, or activities, as laid out in SA Paragraph 68. In conversations with the Department, they have indicated they will begin this type of analysis in

¹⁹ 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. For SA-required trainings currently in compliance, if LASD does not continue to assess and, as appropriate, revise trainings when audits, data analysis, or other reviews indicate that the course may have shortcomings, they will be at risk of falling out of compliance.

conjunction with the report from the Center for Policing Equity on stops by LASD-AV deputies. The MT notes the station commanders have begun discussing enforcement activity by race during the CMF/RMF meetings, and they report using the dashboards to track deputy enforcement activities by race/ethnicity and to provide direction to station personnel as needed.

These sorts of reviews and discussions will need to be expanded and formalized. In the next reporting period, the MT will discuss with OCP and the stations efficient ways for the MT to track these efforts in order to assess compliance and to ensure the practices are conducted in a consistent, fair, and sustainable manner.

a. LASD Collaboration with the Center for Policing Equity

Over the last year, LASD partnered with the Center for Policing Equity (CPE) to analyze stops data for certain cities patrolled by LASD deputies, including in Lancaster and Palmdale, between 2020 and 2022. In addition to data review, members of CPE conducted site visits to the AV stations from August 20 to 24, 2024, during which they interviewed deputies and station leadership to help inform the analysis and report. The CPE reports for each station were provided to the MT and DOJ on December 11, 2024, and are currently under review. CPE also led virtual meetings summarizing the report methods and results, answering questions from the stations, and discussing plans for finalizing the report and sharing it with the public. The MT and DOJ also participated in these meetings. Broadly speaking, the CPE's report provided analysis of LASD deputy activity for Lancaster and Palmdale stations related to uses of force, stops, and calls for service in AV. In the next reporting period, the parties will discuss next steps, including the release of the report to the public, an assessment of the extent to which the report meets SA data analysis requirements, especially disparity assessments (SA Paragraph 68) and use of descriptive and regression statistics to identify potential disparities in enforcement (see SA Paragraphs 83 and 153), and how the AV stations will use report results to inform practice. Future analyses of current data will also be discussed. As they review the CPE findings, the Department is urged to compare those results with the MT's disparity analysis, which is at the [Analysis of LASD Stops in the AV January–July 2019](#) link on the Monitors' website.²⁰

The AV station commanders will now have analysis from the CPE, crime plans for the stations, and access to recent stops information via the new dashboards. These are all critical tools for the AV station and NPD leadership to regularly consider questions such as the following (see further examples of approaches to the assessment of data findings in Appendix A).

- Has the community been involved in identifying the crime priorities in this area? What type of enforcement is taking place in the neighborhood? What criminal activity or community concerns are the law enforcement activities responding to? Are the station activities in part in response to community input?

²⁰ The full name of the report is *An Analysis of Racial/Ethnic Disparities in Stops by Los Angeles County Sheriff's Deputies in the Antelope Valley*. It is available at <http://www.antelopevalleysettlementmonitoring.info>.

- Is any noted disparity potentially a consequence of enforcement decisions made by specific deputies? Might 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 or enforcement that is likely to have a smaller adverse impact on the community?
- Where do the law enforcement activities fit into station crime prevention strategies?
- Would deputies engaged in enforcement in these areas benefit from enhanced training in community engagement? Procedural justice? Bias-free policing? Implicit bias? Bias by proxy? Constitutional policing?
- For enforcement efforts over an extended period, are there regular report and review mechanisms built in to ensure the activity is regularly evaluated?
- Is increased regularity and depth of review of stops by sergeants warranted to provide deputies with feedback regarding their interactions?

The Department's use of such data to conduct introspective analysis regarding potential disparities is a key component to establishing and maintaining trust with the community as well as meeting the SA requirements of Paragraphs 68 and 81–86. Many of the conditions present at the outset of the SA were based on significant concerns about bias-based policing practices in the AV, particularly with enforcement stops, BSDs and home-based searches. The LASD stations should regularly review all the areas of concern discussed in previous MT and AAB audits and reports. In the past, these comments and suggestions did not lead to significant action on the part of LASD, but the new administration has taken these concerns more seriously and has built accessible data sets to conduct timely analysis. LASD must be attentive to specific community concerns about disparate enforcement or stop trends in the AV community. As discussed in the Stops section, LASD has made both their stops information and crime statistics available to the public using the same dashboard technology available to LASD. It is reasonable to expect the community will begin to use the data and ask specific questions about enforcement patterns in the community and LASD's response to crime.

The station captains have shown a willingness to learn about disparity assessments and examine data and information that can be helpful in assessing this. In a recent meeting between the MT and the AV station captains, there was a specific discussion about ways to conduct the analysis at the station level and how to document follow-up discussions with deputies regarding the information. The station commanders have used the dashboards in conversations with deputies, but it has primarily been in relation to a discussion of use of force, pursuits, or complaints. The AV captains expressed a willingness to use the stops information more with deputies but would like to see examples of the information used before using it station wide. The MT provided examples for the analysis and use of the data, and provided recommendations for next steps.

LASD has made progress in this area, particularly in the availability and accessibility of data for analysis. To reach compliance, LASD will need to routinely use the data to conduct the required disparity analysis.

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

- The Department is not in compliance regarding 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. Fortunately, the LASD-AV stations' supervisors now have access to the dashboards that can provide ready access to some of the key information needed to conduct these assessments. To achieve compliance with this provision, LASD must regularly assess indicators of a deputy's ability to practice bias-free policing and any related violations. In addition to establishing a methodology for this assessment, LASD will need to make sure deputies are aware they will be evaluated in this way, supervisors are trained in implementing the reviews, and managers review supervisory evaluations to ensure Department expectations are met.

4. Successes and Obstacles

In the previous reporting period, the AV station captains were new to their roles and still learning their responsibilities. The captains focused on lowering the backlog of administrative work and shoring up their community engagement efforts. In this period, the captains continued to focus on those two areas but have now had the opportunity to utilize the new data dashboards. As discussed in the Stops section, the internal dashboards now include detailed information about stops conducted by AV deputies. This is a powerful new capability and helpful tool in evaluating whether any deputies in the AV are possibly exhibiting signs of bias in their interactions and, if so, how to correct those issues. The MT has met with station commanders to discuss strategies to use for this analysis and provided recommendations. The Department's partnership with the Center for Policing Equity (CPE) may provide some assistance to the station commanders when they receive the analysis of stops in the AV. The MT will review the findings of the CPE in the next reporting period.

Working with data to identify possible disparity practices and concerns requires critical thinking and a willingness to look inward. It also requires a willingness to have honest and open conversations with staff who may have displayed patterns of enforcement reflecting bias. The presence of a disparity that may be found in that data does not automatically mean bias-based policing is occurring, nor does it mean it is not. The importance of the conversation is to identify whether intervention(s) might be necessary and ensure the enforcement activity is being done in a bias-free manner.

The station captains have recently been discussing enforcement programs and activities and related racial data during their presentations in CMF/RMF meetings. They have shown awareness of the importance of looking for non-enforcement ways to address crime and disorder issues and an interest

in considering tactics that can reduce any adverse impacts stemming from an over-reliance on enforcement activities in the community. This is a critical message for leaders to communicate to AV deputies and to inform decisions about crime reduction efforts. This important work is at the core of the SA and, more importantly, reflects what the community expects LASD-AV station commanders to consider when carrying out their policing strategies.

Finally, as required by the SA, 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” (Paragraph 67). The AV stations need to develop a process by which supervisors can assess this requirement.

5. Next Steps

a. *LASD*

- Continue to provide the required full-day bias-free policing training and the quarterly roll call trainings.
- Update the roll-call training session scenarios to include important policy reminders of bias-free practices and procedural justice principles.
- LASD needs to consult with experts on stereotypes or bias and to ensure that LASD training provides clear guidance to AV deputies on influences of bias and stereotype threat.
- 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 to review and approve 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 respond to any identified disparities in enforcement when warranted.
- Continue to refine and train LASD-AV managers and supervisors on the use of the new internal dashboards.
- Provide the MT with any plans or documentation of efforts to identify and address any potential disparities in LASD enforcement in the AV.

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.
- Provide TA to LASD for the effective use of data to assess the work of deputies and crime reduction programs in the AV as required by the SA.

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 that 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. The AAB has conducted numerous mini-audits of stops, consisting of case-by-case reviews, and has not reported any violations of this provision. Additionally, LASD has made significant progress by providing station commanders with timely and accessible stops information to understand deputy stops in the AV. However, full compliance assessment for this provision requires additional assessment beyond the audit, including quantitative and qualitative reviews of stops measured across multiple data sources 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 with 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	Yes 12/24	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. With the CPE disparity assessment reports nearly finalized, the MT will be tracking how CPE and LASD work together to use the information to inform any changes to policy, training, supervision, and practice. 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	Yes 12/24	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 compliance. Moving forward, better tracking of instances where translation services are requested in the field will facilitate more efficient monitoring of this provision.				

TABLE 2					
BIAS-FREE POLICING COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
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.				
68	All LASD-AV programs, initiatives, and activities are analyzed annually for disparities.	NA	NA	Partial	No
	Notes: LASD has new dashboards with stops, complaints, uses of force, and other sources for station commanders to use to assess potential disparities in the AV. LASD now has the foundation pieces to begin this important assessment. LASD has yet to conduct the required analysis for each activity, but most interactions between deputies and the community happen during stops, so CPE's stops disparity assessment represents substantial progress on this provision. The LASD has made progress by discussing disparity in enforcement activity by deputies during the new CMF/RMF meetings, but much work remains to be done in this area. MT will discuss additional documentation of this provision for compliance in the upcoming year, including tracking any actions taken by the AV stations in response to the CPE report.				
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 of training.				
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 training throughout 2023. Compliance for 2024 will be measured in the next reporting period.				

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.²¹

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.

7. Housing Compliance Status Table

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

²¹ 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 nondiscrimination (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

During this reporting period, LASD made impressive progress in this area including the following.

- Reached compliance with the data collection requirement (SA Paragraph 81) and partial compliance with the data reliability provision (SA Paragraph 83a).
- Reached partial compliance with Paragraphs 83b and 85, signifying the Department is in partial compliance with all four provisions that require data analysis and the application of data to inform practice in this section.
- Worked with CPE to produce reports for each station that include the results of regressions and other analyses to assess whether LASD practices have a disparate impact on communities of color (SA Paragraphs 83b).
- Expanded the station managers' use of the various recently developed dashboards for stops, force, complaints, and other risk management as well as administrative information.

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 those sections for further discussion.

1. Progress on Data Collection and Analysis Provisions

- LASD is in compliance with SA Paragraph 81.
- LASD is in partial compliance with SA Paragraphs 82–85.
- The Department remains out of compliance with reporting requirements in SA Paragraph 86.

The Department has made progress in each of this section's subject areas, including continuing work to modernize and improve the reliability of its data systems; implementing and expanding the use of its internal stops dashboards and generally expanding its use of data and data analysis to drive self-assessment and decision making at the stations and NPD; and continuing its partnership with CPE, including the initial release of CPE data analysis reports for both stations.

2. Successes and Obstacles

After years of stasis, in the last two reporting periods the Department has achieved impressive progress in this section and in other data analysis-related SA paragraphs. The current administration has chosen to promote and support a can-do culture where technological limitations are overcome by hard work and innovation, and data and transparency are perceived as aids to improved policing and greater community trust. The requirements of this section are about the process of thoughtfully using data to inform practice. For the most part, reaching compliance with these provisions is no longer a matter of building capacity and know-how but rather about doing what the stations are already doing and doing so more regularly, with more uniformity, and with more documentation of the process. This is necessary for the purposes of compliance assessment and, more importantly, for institutional knowledge continuity.

3. Next Steps

- 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.
- In consultation with the MT and DOJ, LASD will develop reasonable methods for memorializing its various analyses, assessments, and resulting actions.
- LASD will publish the work resulting from the CPE partnership, develop plans for next steps regarding taking corrective action where needed and regarding additional or follow-up analyses, and engage with the community regarding the findings and next steps.
- The MT will provide feedback and technical assistance as appropriate.

4. 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	Yes 12/24	No
	Notes: LASD has been collecting the required data for several years. The approved plan to rely on SACRS data rather than CAD for recording and reviewing stops information will expand the thoroughness and usefulness of the data collected. To reach sustained compliance, the SACRS plan needs to be implemented and other current data collection processes need to be followed for another year.				
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. CPE has submitted a draft data analysis report for review and discussion, and the MT is reviewing it for compliance ramifications. Compliance will require that all data analyses laid out in Paragraph 82 are conducted at least semi-annually, whether through the CPE analysis or in some other way. LASD will need to provide documentation of the process, which should include: (1) analyses conducted (82a–g), (2) LASD interpretation of findings (e.g., What factors are contributing to the disparity? Are there alternatives? etc.), (3) any actions taken by the stations in response to the findings (e.g., briefings, training, policy revisions, supervision, mentoring, etc.), and (4) outcomes and lessons learned since the previous analysis. In the next reporting period, the parties will further discuss the content and format of the documentation.				
83a	LASD uses accurate, complete, and reliable data.	NA	NA	Partial	No
	Notes: Reliability of the CAD data has been an issue, but the plan to use SACRS data should address most of those concerns. The Department has established various checks on PDE and PRMS data reliability. For compliance with data reliability, LASD will need to implement the SACRS plan and continue thorough internal data checks to include corrective action as needed, and AAB and MT audits must confirm data integrity.				

TABLE 4					
DATA COLLECTION AND ANALYSIS COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
83b	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	Partial	No
	Notes: LASD partnered with CPE to conduct analysis and produce a report that includes regressions and other analyses to assess whether LASD practices have a disparate impact. The report is currently being reviewed by LASD and will be made public in the next reporting period. The MT is reviewing the report for compliance ramifications, including whether all 83a–d analyses were conducted as required. In consultation with the MT and DOJ, LASD will need to develop a long-term plan to conduct and report on similar analyses to achieve and maintain compliance.				
84	From the analysis in Paragraphs 82–83, LASD identifies any concerning trends or issues and assesses whether any practices, policies, training, etc., need to be changed to ensure adherence to constitutional and/or effective policing.	NA	NA	Partial	No
	Notes: LASD has taken steps toward compliance with this provision. The AV stations continue to build capacity for identifying concerning issues and taking corrective action through various avenues, such as the dashboards, quarterly reports, weekly Cat-2 force reviews, MT or AAB audits, and RMF/CMF. For compliance, the stations will need to routinize and document these processes (as described in Notes for Paragraph 82).				
85	LASD's analysis identifies any problematic trends among reporting districts or deputies and takes appropriate corrective action. LASD conducts these reviews regularly, and the analysis is incorporated into routine operational decisions.	NA	NA	Partial	No
	Notes: LASD has taken steps toward compliance with this provision. The dashboards provide analysis by deputy and reporting district, and the stations are using these analyses in the CMF/RMF. The CPE analysis also included geography as a factor; any actions taken in response to the CPE report will be assessed in the next reporting period. For compliance, the stations will need to routinize and document these processes (as described in Notes for Paragraph 82).				
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
	Notes: The MT and DOJ will review the CPE reports to assess the extent to which they meet the requirements of this section. LASD will need to provide its assessment of the CPE findings and any actions taken in response. The final reports will need to be published in English and Spanish.				

F. Community Engagement

The AV stations have shown considerable progress in the area of community engagement during this reporting period. LASD is now in compliance with all but four of the provisions in this SA section. Out of 20 provisions (including two addressing the deputy survey from the Bias-Free Policing section), LASD is in compliance for 16 and in sustained compliance for 12.

Progress in this reporting period included:

- LASD has achieved compliance with two provisions where they were previously in partial compliance (Paragraphs 88 and 94) and are now in *sustained* compliance with one provision (Paragraph 93).
- It appears the Department is on track to reach sustained compliance with two additional provisions (Paragraphs 87b and 95) in the next reporting period.
- LASD has submitted a training curriculum intended to comply with Paragraph 89 (currently under MT and DOJ review), and they are preparing a plan for conducting a deputy survey (SA Paragraphs 69 and 72).

1. CACs

- The Department is now in compliance with SA Paragraph 94, which requires including youth on the Community Advisory Committees (CACs) or some other advisory group, that “[CAC] membership is representative of the diverse communities in the Antelope Valley, including members from each station, faith communities, minority, ethnic, and other community organizations,” and holding quarterly meetings.
- Regarding provisions related to facilitation of the CACs, LASD is now in sustained compliance with SA Paragraph 93 and remains in sustained compliance with SA Paragraphs 87c, 96, and 97.

The efforts at both stations to re-energize their CACs have shown success. They have provided increased transparency in establishing clearer expectations, enhancing information flow, and improving community engagement. Palmdale currently has 12 members, and Lancaster has eight. The Youth Council supported by a local community-based partner, Future Leaders of California, continues to represent the AV and serve as a youth CAC. Both stations have created informative pamphlets explaining the role and responsibilities of a CAC member and the process for joining the committee. This work serves to orient both potential and current members about the importance of the CAC and the commitment expected of members, and encourages broader participation.

2. Deputy Attendance at Community Meetings and Events and Enhancing Relationships With Diverse Groups

- The Department is now in compliance for deputy community engagement and enhancing relationships with particular groups, including youth and communities of color (a component of SA Paragraph 88).

The AV stations made several efforts in this reporting period that led the Monitors to find them in compliance with SA Paragraph 88. The stations were in compliance for deputy engagement in community events or self-initiated interactions with the public (aka 755s) in 2023 and appear on track to continue compliance in 2024 (to be measured in the next reporting period). Both stations have attendance plans in place and have adjusted their engagement practices in response to information received through the Community Survey, community input from events and meetings, station surveys, and Shift Recap Forms (Palmdale). In this reporting period, both stations updated their attendance plans and provided them to the MT and DOJ for review. Additionally, as expanded on in the community engagement reports (see below), the variety of community events the stations are holding or participating in continues to grow.

In addition to the SA-required quarterly town halls led by the CACs, Palmdale and Lancaster stations organize a variety of community engagement events that allow positive interaction between AV deputies and community members with diverse backgrounds. The MT encourages readers to access LASD's Community Engagement Efforts Report, October 2024,²² and the stations' Community Engagement Reports for additional events as well as LASD's assessments of the work. Some examples of events that warrant particular attention were the following.

- On November 25, 2024, Lancaster station hosted a Thanksgiving turkey giveaway for the first time. They provided 170 turkeys and related foods (pies, stuffing, etc.) to families. This was done in collaboration with the AV sheriffs' boosters and local business partners as a way to connect with their community.
- On December 3, 2024, Palmdale station hosted a public meeting with the Spanish-speaking community to address concerns about the role LASD will take regarding immigration enforcement once the new federal administration takes office. LASD partnered with SALVA, Agents of Change, and AVLULAC to promote and hold the meeting. Approximately 45 community members attended and asked questions of the Department that were responded to by Spanish-speaking LASD personnel. LASD personnel stressed to attendees that every deputy's job and focus is on solving and preventing crime, and they are not concerned with immigration status. Questions were posed and LASD provided answers regarding the Department's role in immigration policy, sanctuary cities, federal versus state laws, and some non-immigration issues. The Department plans to hold another similar meeting in January.
- On December 21, 2024, at a community event organized by AV sheriff boosters and Antelope Valley Transit, Lancaster and Palmdale stations and the CACs gave away 325 youth bicycles and 3,500 turkeys.

LASD's continuation of these kinds of efforts to engage with and maintain effective relationships and communications with a wide range of demographic groups they interact with and serve, such as youth and communities of color, is evidence that the stations are committed to improving relationships and achieving mutually beneficial outcomes with all members of the AV community.

²² See the Compliance Unit website: https://lasd.org/antelopevalleycomplianceunit/#public_reports_on_av

In order to maintain compliance, the monitors encourage two things: (1) keep up the good work, and (2) encourage deputies who attend community meetings to actively, positively participate. While we do not expect perfection, we note that we have observed some occasions in community meetings where some deputies appear to be disinterested or uncomfortable when it comes to engaging with members of the public with whom they may not already be familiar. However, this is not as commonplace as we have noted in the past. Community Survey

- LASD remains in partial compliance with Paragraphs 69 and 72 (in the Bias-Free section), which require LASD to conduct a community survey and engage experts in studying the organizational climate and culture of the AV stations, and in developing related training to support the bias-free policing objectives.
- LASD remains in sustained compliance with Paragraphs 98, 99, 100, 101, which require LASD to support the activities related to the community survey and to post the survey on the LASD-AV website.

Since the first Community Survey published in 2018, LASD has supported the efforts associated with the survey specified in Paragraphs 98, 99, 100, 101. The results of the fourth AV Community Survey were posted on the LASD-AV website on October 23, 2023.

In the previous reporting period, LASD requested funding for an organization-wide community survey as well as a culture and climate study (aka "deputy survey"), but that budget request was denied. In order to achieve compliance with SA Paragraphs 69 and 72, LASD needs to conduct an approved culture and climate survey and apply its findings. The Parties and MT have discussed options for this deputy survey and will continue those conversations in the next reporting period. Importantly, LASD needs to continue to document how the AV community survey and culture/climate survey are used to inform the stations' community engagement activities as well as bias-free policing practices and training.

3. Community Engagement Training

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

LASD has revised and improved on the community engagement training that was last reviewed by the MT and DOJ in 2022. LASD submitted the revised training on November 25, 2024, and the MT and DOJ are currently reviewing it for compliance. A compliance assessment and feedback will be provided in the next reporting period. We appreciate that LASD has reengaged in the development of the community engagement curriculum.

4. Community Engagement Reports

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

LASD remained in sustained compliance during this reporting period. The MT notes that the required community engagement reports should continue to improve their assessment of successes and obstacles to community trust and engagement. They should also reflect and discuss the impact and effectiveness of increased efforts by the stations to apply problem-solving processes to community concerns and input. LASD is scheduled to publish the next 2024 Antelope Valley Community Engagement Report in the upcoming reporting period. The public is encouraged to view the reports at the Department's Compliance Unit website.²³

In the interim, LASD published a report, *Community Engagement Efforts October 2024*, which outlines LASD's community engagement efforts in six stations across the county. (Also available at the Compliance Unit's website.) Among other important activities, the report provides the findings from the US Department of Justice's Community Relations Services (CRS)-facilitated "Days of Dialogue" meetings, which were facilitated discussions on community perceptions and relationships with LASD. LASD and CRS partnered in this effort as a result of concerns related to "deputy gangs and cliques" identified in the 2023 Civilian Oversight Commission Report.

The publication of this Community Engagement Efforts report shows progress in important areas, including LASD's efforts to improve transparency and communication with the community about the community's concerns and the Department's willingness to engage in constructive criticism. In this report, LASD committed to developing a "community engagement handbook" for all LASD patrol stations to share best practices and enhance their community engagement activities in a comprehensive and consistent manner throughout the Department. The MT and DOJ received a draft of this handbook in December 2024 for review and feedback. As of the writing of this report, the handbook is being reviewed by the MT and DOJ. The MT is pleased with LASD providing more documentation and transparency with the public and holding themselves accountable to timeframes and outputs, which in turn helps establish trust in its relationship with the community.

5. Diversion

- The Department is in sustained compliance regarding 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 observation, and discussion with community members since 2021. LASD has maintained compliance in this area for several reporting periods and is in sustained compliance.

²³ https://lasd.org/antelopevalleycomplianceunit/#public_reports_on_av

6. Crime Management Forum and Risk Management Forum

- While substantial progress has been made in this reporting period, the Department remains in partial compliance with SA Paragraph 90.

For some time now, the Department has been discussing its desire to combine the semi-annual Risk Management Forum (RMF) with the monthly Crime Management Forum (CMF). The idea was to have stations integrate both forums into one discussion of trends, community engagement, and management oversight of high-risk events. During this period, the Department held its first combined RMF/CMF, chaired by the undersheriff. Key changes in this format included the following.

- Data gleaned from the automated systems mentioned earlier were presented.
- Each station's information was presented and discussed comprehensively before moving to the next station, which facilitated more in-depth discussions of each station's issues and trends across subject areas.
- Stations were required to present and discuss their top three or four community engagement priorities and provide relevant data, such as the number of community outreach events, CAC meetings held, problem-solving activities, and so forth.
- Data was presented on each station's PMP participants, station-level mentoring, Department-level mentoring, and timeliness of assigning mentors.
- Data and trends showing each station's level of compliance with Settlement Agreement requirements.

In all, we found this to be a tremendous improvement over prior RMFs. The material presented was discussed in detail, and correlations were drawn among related factors such as community concerns, stops, and crime patterns. The AV stations have quickly embraced the dashboards only recently made available to them and are using them to examine individual deputy behavior as well as work units. They are also embracing AAB's audits and expressed sincere appreciation for the timely feedback on force, complaints, and stops.

Among other staffing issues reported, both stations have several detective vacancies, and, without a promotion list, they are loaning out deputies to fill those positions temporarily. In the past, deputies perceived as "highly productive," in terms of arrests, tended to receive those assignments, but the captains are now filling those vacancies with deputies who consistently "do the right thing." This criterion for internal reward and recognition sends a strong message to everyone and sets the tone for management expectations.

The presentations are now more thorough than in years past, often tying community concerns to directed enforcement activity. Captains are including thoughtful statistical analysis on calls and observation activity, utilizing the dashboard to provide an overview of RIPA stops, and providing good discussions on particular focused patrol areas. Heat maps have been used to overlay traffic stops with Part I and Part II crime data and reflect potential correlations. The captains also reported using such mapping to inform station community engagement activities.

It is also interesting to see that captains from other stations are now availing themselves of the work

being done by the AV captains. Several non-AV captains talked about seeking advice from the AV captains on using data to inform their management decisions. In another example, the non-AV commands have begun using CAD to identify locations with high incidents of force and/or mental health issues causing a police response. The most recent RMF/CMF was without doubt the best we have observed at LASD. The station captains and especially the support staff who helped put these presentations together are to be commended for the progress in this area.

LASD remains in partial compliance for SA Paragraph 90. Early in the next reporting period, MT members will meet with station captains to discuss additional questions and discussions we'd like to see included in the analysis process to minimize the risk of missing important issues and to achieve compliance. The first discussion is scheduled for mid-January, during which the participants will clarify what will be required in upcoming CMF/RMF meetings in order for the Department to reach compliance with Paragraph 90. We will also discuss other SA provisions that need increased attention, such as review of possible negative impacts of some law enforcement activities and review of possible disparities (SA Paragraph 68), and whether the Department wishes to address those in the CMF/RMF or in some other manner.

7. Successes and Obstacles

In our observations of the OCP's strategic efforts regarding meeting the SA requirements and, more importantly, changing LASD culture in numerous ways and of the extensive community engagement efforts of the AV stations' leadership, the MT notes that LASD has demonstrated increased proficiency and success in its community engagement efforts. LASD continues to experiment with new approaches to community events. The stations have worked on creating additional protocols for CAC membership and activities, including an orientation packet, and regularly share important UOF and complaint trends with the CACs. The stations have issued station briefings to deputies on the importance of positive community engagement attitudes and activities and given associated instructions that all deputies have more frequent non-law enforcement based interactions with community members. Importantly, the stations are improving their methods for documenting this hard work and are working to develop better tracking of community concerns and LASD's response. The MT applauds these efforts and will continue to assess the success of these initiatives over the next reporting period.

LASD's submission of a revised curriculum for Paragraph 89-related community engagement training is another crucial 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 look forward to working productively with LASD on finalizing the training and developing an implementation plan.

The MT also applauds the efforts of OCP, NPD, and the stations to improve the CMF and RMF and related processes. The most recent combined CMF/RMF meeting reflected a convergence of several areas that have shown particular progress in the past year, including but not limited to the various internal dashboards, the station captains' commitment to incorporating data-driven decision making and accountability measures into daily operations, and NPD leadership emphasizing, among other things, use of data, professional scrutiny, and increased engagement with the community. The MT supports this progress and looks forward to providing TA and feedback.

8. Next Steps

a. *LASD*

- Continue to hold, expand, and refine 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 appropriate feedback from the MT and DOJ on the submitted training required in SA Paragraph 89.
- 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.
- Continue to use the results of the fourth Community Survey to inform law enforcement and community engagement activities.
- Support the administration of a fifth community survey, and/or develop an alternative countywide community survey and a deputy survey.

b. *The MT*

- Review the community engagement curriculum.
- 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.
- Review any submitted documentation such as CPE work plans and reports, the 2024 Community Engagement Report, and a new deputy survey methodology and instrument; conduct a fifth community survey or work with LASD to develop a new methodology and instrument.
- Continue to observe and provide feedback on the CMF and RMF.

9. 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 deputy survey has been administered twice. LASD requested funding for a countywide community survey and an organizational climate and culture survey (aka Deputy Survey), but the budget request was not approved. LASD is currently developing a plan for conducting its own deputy survey.				
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 12/22
	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	NA	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. Compliance was established in June 2024. If this good work continues through the next reporting period, LASD will be in sustained compliance.				
87c	Develop CACs.	Yes 12/11/19	NA	Yes 06/16	Yes 06/17
	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 12/22
	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	Yes 12/24	No
	Notes: <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. Deputy attendance is reviewed on an annual basis; 2024 will be assessed in the next report. In compliance with the qualitative requirements to account for the need to enhance relationships with particular groups. LASD's outreach to particular groups continues to increase, and LASD personnel have developed a practice of assessing what is and what is not working, and then making adjustments. Continued progress was made in this reporting period toward increasing the extent and quality of the AV stations' engagement with the community. Briefings have been developed for stations to provide guidance on participation in community meetings and 755s to achieve partial training compliance (see also SA Paragraph 89). Palmdale has updated their attendance plan, and Lancaster is working on their attendance plan currently. LASD is in compliance with using the annual Community Survey data to inform the attendance plan. In order to maintain compliance, the MT will be looking for continued use of available data (the Community Survey, station-initiated surveys, input from CAC and community meetings, Shift Recap Forms, etc.) to enhance community relationships. 				
89	In-service training on community policing and problem-oriented policing is provided to all AV personnel.	NA	No	No	No
	Notes: The Department has submitted a community engagement training intended to comply with Paragraph 89. The MT and DOJ are reviewing it this time. After full implementation of the training, outcomes related to each aspect of the community engagement training will be measured in other provisions.				
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
	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.				

TABLE 5					
COMMUNITY ENGAGEMENT COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
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 12/22	Yes 06/24
	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 with this item, and the monitoring team expects that this report will continue to improve as the stations begin to track community events and evaluate results.				
92	Seek community assistance in disseminating SA.	NA	NA	Yes 06/17	Yes 06/18
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 06/20	Yes 12/24
	Notes: The Department continues to support and work with the CACs and must continue to assess this work and make improvements as needed to remain in compliance and to ensure the CACs effectively function in the manner envisioned by the SA. Station management has also been documenting CAC input and providing follow-up.				
94	Memorialize CACs and facilitate quarterly meetings.	Yes 02/11/15	NA	Yes 12/24	No
	Notes: LASD has continued to invigorate the composition of the CAC for participation and representativeness, including youth.				
95	Post CAC reports on LASD-AV website and respond to recommendations.	NA	NA	Yes 12/23	No
	Notes: The Department regularly posts CAC reports and now promptly posts its response to recommendations made in those reports on its website.				
96	Provide administrative support and meeting space for CACs.	Yes	NA	Yes 06/17	Yes 06/18
97	Ensure CACs have no access to nonpublic information.	Yes	NA	Yes 06/17	Yes 06/18
98	Assist the Monitors in annual Community Survey.	NA	NA	Yes 12/18	Yes 12/20
	Notes: See Paragraph 69.				

TABLE 5					
COMMUNITY ENGAGEMENT COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
99	Cooperate with independent researcher in conducting annual Community Survey and Deputy Survey.	NA	NA	Yes 12/18	Yes 12/20
100	Cooperate with administration of the annual Community Survey.	NA	NA	Yes 12/18	Yes 12/20
101	Post annual Community Survey report on LASD-AV website.	NA	NA	Yes 12/18	Yes 12/20

G. Use of Force

The Department was found to have made progress with compliance for several UOF provisions.

- LASD is now in partial compliance for providing UOF training (SA Paragraphs 119a–e) based on its new Taser training.
- LASD is now in partial compliance with SA Paragraphs 117, 118, 120, and 122 regarding the tracking and curbing of concerning UOF trends and UOF data analysis. A related provision, SA Paragraph 121, remains in partial compliance.
- LASD is now in partial compliance for EFRC reviews of Category 3 force and is poised to reach compliance in the next reporting period (SA Paragraph 114).
- LASD is now in sustained compliance for SA Paragraph 106g.

1. UOF Policies

- LASD has an SA-compliant UOF policy and a conditionally approved conducted energy weapons (CEW, aka Taser) policy.²⁴

During the previous reporting period, we reported that the Parties and Monitors had approved the UOF policy and conditionally approved the CEW policy. Both policies have been posted on the Department's website.

2. Use-of-Force Training

- The Department is in partial compliance with its UOF training (SA Paragraphs 119a–e).

While the Department has implemented an approved training for the CEW/Taser, training for the use-of-force policy is still pending.

The Department agreed with employee union requests to develop and implement a use-of-force training before staff would be held accountable to the UOF policies' new provisions. The Department informed the MT and DOJ of their plan to develop a short training video imparting to deputies the changes in the policy as an interim step before revamping the full UOF training. LASD recently reported that they completed development of the video and began presenting it to deputies. The MT and DOJ have not yet been provided the video for review. The MT will also need to review training verification documentation. The parties will discuss these topics early in the next reporting period. For SA compliance, the Department will also need to update its full UOF training to ensure it meets the

²⁴ The conditional approval by DOJ is contingent on: (1) For a period of one year after implementing the CEW policy, the Lancaster and Palmdale stations will provide each month 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 paragraph regarding repeated CEW exposure if LASD personnel are using Tasers in ways that are dangerous or inappropriate.

expectations of both policy and the SA. The MT and DOJ last reviewed revised UOF training materials in 2023.²⁵ The MT hopes to receive the training materials for review in the next reporting period. However, since the CEW/Taser training described below addresses many of the SA requirements for UOF training, the MT has found the Department in partial compliance with SA Paragraphs 119a–e.²⁶

a. Axon Taser 10 Conducted Electrical Weapon Training and Deployment

During this reporting period, the Department rolled out its newly developed training for the deployment and use of the Axon Taser 10 conducted electrical weapon (CEW). The MT finds the Taser 10 to be an excellent procurement for the Department as it represents a new era in less-lethal technology. With extended range and other advancements that will produce higher rates of successful deployment compared to Tasers previously used by the Department, it will help deputies de-escalate tense and evolving situations. The improvements may help deputies avoid protracted force, which should reduce the likelihood of injury to the subject and/or deputies, and, because the Taser 10 emits a bright pulsing light and loud warning alert in advance of deployment, it may possibly result in the avoidance of force all together.

On July 24, MT staff and DOJ attorneys attended the Department's initial eight-hour Taser 10 training session for AV deputies who, under the direction of Sheriff Luna, were the first LASD deputies trained and authorized to carry and deploy the Taser 10. LASD incorporated the MT's and DOJ's feedback and suggestions into the course outline. On August 28, the MT and DOJ attended another eight-hour Taser 10 training session and found the training to be comprehensive and consistent with the feedback. It includes but is not limited to:

- Overview of the use of force;
- De-escalation;
- Defensive tactics;
- Managing distance;
- Active listening;
- System functionality;
- Situational simulations;
- Adult learning exercises and decision making; and

²⁵ See the 16th Semi-Annual Report for a description of our most recent UOF training review. See also the 15th Semi-Annual Report for a description of previous revisions and reviews. All Monitors' reports are available at <http://www.antelopevalleysettlementmonitoring.info/>

²⁶ There is no SA paragraph that specifically addresses CEW/Taser training. However, the CEW/Taser training touches on the following SA paragraphs: 103 (warnings), 104, 105 (objective reasonableness), 108, 109 (reporting) 110 (supervisory notification), 111 (supervisor response and investigation), 112 (supervisor reporting), 113 (chain of command review), 115 (holding deputies accountable), 116 (holding supervisors accountable), 118 (supervisory review by station commanders), and 119 (biennial training).

- Force options simulations.

At the time this report was being prepared, Lancaster had 45 and Palmdale had 79 deputies trained and equipped with the Taser 10 system.

3. Change in Compliance Relating to the Conduct of Force

- LASD is now in sustained compliance with SA Paragraph 106g.

There have been no cases in the four MT UOF audits or in AAB's recent mini-audits where a deputy prevented a person from recording an incident. Also, in non-audit cases that have come to the MT's attention in which a 106g violation was an issue, the Department has conducted investigations and taken appropriate corrective action. Therefore, the MT has found the Department in sustained compliance with Paragraph 106g.

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

a. *Weekly Category 2 Force Reviews*

NPD continues to hold its weekly management accountability meetings, which facilitates prompt reviews and assessments of Category 2 use-of-force incidents that occur in the NPD, including in the AV. NPD staff lead the meetings, which are virtually attended by all NPD captains and select station personnel, and the timeframe for the reviews encompasses cases that have taken place in the most recent week. Operations staff, watch commanders, and/or field sergeants present all recent Category 2 uses of force. Topics discussed include but are not limited to:

- A review of deputies' professionalism and tactics;
- Feasibility and implementation of de-escalation strategies;
- Policy and training considerations;
- Investigative and review guidance; and
- Risk management concerns.

The purpose of this process is to provide an initial and timely assessment of all Category 2 uses of force, identify and address concerning issues, and acknowledge commendable behaviors and tactics by deputies. To ensure they are ultimately addressed, the NPD chief has instructed that all concerns identified in these meetings be tracked and addressed during the investigation and adjudication of the force incident. If any concern is identified during a review of a use-of-force incident, it is prioritized for investigation completion and review. MT staff virtually attend these meetings, which are well run, hold station managers accountable, and serve the Department and the communities it serves well.

b. UOF Data Analysis

- LASD is now in partial compliance with SA Paragraphs 117, 118, and 122, and remains in partial compliance with SA Paragraph 121; these are provisions that address the tracking and curbing of concerning UOF trends and UOF data analysis.

The Department has also implemented its Performance Oversight Information Tracker (POINT) data dashboard system to provide unit commanders a more comprehensive and timely ability to review deputies' performance, policy and training considerations, and risk management concerns involving UOF and complaint cases and trends. The system provides metrics on the status of cases and can be used to ensure internal reviews are conducted promptly. The AV station captains have begun to use POINT to track deputy trends and patterns related to UOF and that correlate with other risk management issues. The refinement of the system is ongoing; for instance, the Department has been responsive in resolving concerns that have arisen regarding data availability. 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.

The monitors have found LASD to be in partial compliance with Paragraphs 117, 118, 121, and 122. Specifically, LASD has made significant progress in making UOF data and information readily available to station leadership, and we are seeing evidence during our site visits that station captains are using these dashboards to support, supervise, and redirect deputies in their command. In order to reach compliance, LASD will need to develop a structure by which these reviews are conducted and documented so they may be routinized. Also, MT members continue to meet with the four AV captains and discuss methodologies to assess the use of force, use-of-force investigations, management review procedures, audit methodologies, and data analysis associated with the Quarterly Reports.

The Department also provides publicly available UOF data at <https://lasd.org/transparency/public-force-statistics>. This is a valuable resource for gaining a better understanding of the nature and frequency of force used in the AV and across the county. Additionally, the Department's own analysis of use-of-force data will need to be documented in a public report as per SA Paragraph 123. Those reports will include analyses conducted, findings, the Department's evaluation of those findings and any issues they identified, and any corrective action taken in response.

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

- LASD is now in partial compliance for the EFRC review of Category 3 force (SA Paragraph 114).

Essential improvements have been made to the EFRC in the last two reporting periods. As described below, except for one remaining issue, the EFRC reviews are in compliance with the SA. That issue is how the Department will address non-force policy violations that arise during a Category 3 use of force. Paragraph 114 requires the EFRC to review incidents *"for any policy, training, or tactical concerns and/or violations."* Now that deputies are equipped with body-worn cameras (BWCs), non-force policy violations and concerns on the part of uninvolved deputies such as seat belt violations, excessive speed, and BWC activation issues can be and are being more readily identified by supervisors and

management. The Department intends to memorialize those issues in its EFRC memorandum, which they will forward, with a response being required, and will use to assess its effectiveness and impact on the unit and division. The MT will monitor this process; we expect compliance to be achieved in the next reporting period.

a. MT Review of Recent EFRC and CIRP Meetings

The most serious uses of force (Category 3) are reviewed by the CIRP shortly after the incident occurred. The CIRP's focus is to identify any preliminary risk management concerns related to policy, training, tactics, Department practice, or the actions of the involved employees. After the investigation is completed, the EFRC 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.

There was one AV CIRP and three AV EFRC reviews conducted during this reporting period. The MT monitored each of those management reviews, two remotely and two in-person.

Critical Incident Review Panel

The one Category 3 use of force that occurred in the AV this period was reviewed by the CIRP about four weeks after it happened. The hearing was held at the Hall of Justice and, unfortunately, the quality of the virtual connection prevented adequate MT observation. The Department responded quickly to that problem and committed to fixing it for future reviews. We will observe and report on any CIRP held in the next reporting period.

One issue related to the CIRP that remains unresolved is the way deputies are returned to field duty following a shooting or other critical incident. As discussed in the last three semi-annual reports, in early 2022 we began noting inconsistencies in the way deputies were being returned to field duty following a deputy-involved shooting. Some seemed to have been returned before the CIRP reviewed the case while others were not. Since then, we have met with Department representatives and exchanged documents to ensure clarity surrounding the process and the Monitors' concerns. The Department ultimately concurred that the process needed to be more clearly articulated in Department policy and that managers needed to document those decisions. To clarify our position, on September 17, 2024, we informed the Department that it needs a clear policy statement regarding deputies being removed from the field following a shooting or other critical incident, including their participation in psychological counseling, identifying who is authorized to decide on returning a deputy to the field, and how those decisions are to be documented. We look forward to reviewing that policy once it is developed.

Executive Force Review Committee

The EFRC continues to benefit from the changes implemented in the last reporting period, which we

described in the last semi-annual report. Those changes, which became effective May 2, 2024, include in-person meetings, with remote access limited to those who need to participate but cannot attend in person; participation limited to EFRC members, the Professional Standards Division staff, invitees, and oversight agency representatives; cessation of pre-EFRC meetings; Training Bureau to respond to questions but not asked for its assessment of the incident; and the Unit Commander and Division Chief conduct a detailed review and provide their insight to the committee.

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

In our last report we noted significant improvement in the depth and thoroughness of the reviews conducted subsequent to these changes being made. This progress continued in the three cases reviewed by the EFRC during this reporting period. In all three reviews held this period, the station captains provided a very thorough analysis of each case, clearly recognizing the positive aspects of each incident, areas where deputies fell short of expectations, and areas needing improvement. In short, the EFRC process has become much more robust and thorough. When LASD resolves the one remaining issue described above, related to how the EFRC addresses non-force related policy violations that arise in Category 3 investigations, they will be in line to reach compliance with Paragraph 114.

6. LASD AAB Use-of-Force Internal Audit Processes

We are pleased to report that under the current leadership, the AAB continues to make significant strides in improving the Department's internal audit processes with regard to force. During this reporting period, MT staff met with the AAB captain and other staff on several occasions to discuss the internal audit process, audit planning, sampling, methodology, findings, recommendations, and reporting. The meetings were very productive, and AAB has been responsive. AAB staff clearly understand and embrace their role in ensuring that the Department's internal audit process enhances performance, risk management, and sustainability moving beyond SA compliance.

Toward that end, the AAB produced three UOF-related mini-audits to assess the reporting, de-escalation, and management review of uses of force in the AV. While the sampling methodology was not sufficient to project audit findings on the entire population, the audits were well done and achieved their purposes, which were to provide the AV station captains with timely information and helpful insights to be used to improve UOF-related processes and to provide indicators of the Department's compliance status to help determine whether a full audit should be conducted. The audits' findings documented an improvement in the completeness of these investigations and of the review of use-of-force incidents occurring in the AV, and the AV station captains are commended for this achievement.

We are hopeful that these steps forward by AAB will soon position it, where appropriate, such that its audits can be utilized in MT assessments of LASD's SA compliance.²⁷ In the next reporting period, the parties will discuss a plan for future audits; in addition to the MT audit already underway, this would include development of audit plans designed for the purpose of measuring compliance.

7. Successes and Obstacles

Collectively these changes have introduced fresh strategies and organizational direction, accountability, and direction and impetus to not only achieve SA compliance, but more importantly to ensure the sustainability of the SA's provisions and reforms once compliance has been achieved.

8. Next Steps

a. *LASD*

- North Patrol Division will continue to conduct weekly meetings to perform preliminary assessments of Category 2 use-of-force investigations to identify risk management issues, policy compliance, training improvements, and managerial accountability.
- The Department will finish providing training on the approved use-of-force policies and fully implement the policy, and will hold Department employees accountable to the policy's mandates.
- Audit and Accountability Bureau will work in conjunction with the Monitors and prepare an annual audit plan to be approved by the Monitors and DOJ and implement the plan.
- Training Bureau will continue to provide updated training on use of force and defensive tactics.
- Develop a draft policy on returning deputies to the field and submit it to DOJ and the Monitor for review and approval.
- Develop a process to address non-force policy violations that arise in investigations.

b. *The MT*

- MT staff will continue to collaborate with AAB staff in its SA-related auditing processes in the AV.
- MT staff will complete a compliance audit of the use, investigation, and adjudication of force in the AV.
- MT staff will continue to meet and collaborate with AV Unit Commanders and the AAB Captain to provide consultation toward the Department achieving SA compliance.

²⁷ 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."

- MT staff will continue to monitor and comment on CIRP and EFRC reviews.

9. UOF Compliance Status Table

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

(See also Appendix A in the Monitor’s 17th Semi-Annual Report for the findings of each of the MT UOF audits to date at <https://www.antelopevalleysettlementmonitoring.info/>)

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	Partial	Cat 1 and 2: No Cat 3: No	No
	Notes: The MT's fourth UOF audit found that LASD is not in compliance with several UOF provisions. During this reporting period, the Department agreed with employee union requests that the UOF policy would not be implemented until the Department has provided training on the policy's provisions. LASD reports that an interim video training is currently underway and that policy implementation will occur early in the next reporting period.				
103	Use de-escalation techniques before resorting to force and reduce force as resistance decreases.	Yes	Partial	Cat 1 and 2: No Cat 3: No	No
	Notes. Compliance will require an approved and implemented UOF training and subsequent approved audits (either by MT or AAB) that use an approved methodology to measure whether the compliance metrics are met (i.e., that the provision is reflected in the field). AAB's UOF mini-audits found all of the cases they selected for audit were compliant with this paragraph. This is an indicator of impressive progress. In the next reporting period, the parties will discuss the development and conduct of audits for measuring compliance.				
106g	Prohibit using force on a person legally recording an incident.	Yes	No	Cat 1 and 2: Yes Cat 3: Yes	Yes
	Notes: The Department is in sustained compliance with Paragraph 106g because there have been no cases in any of the four UOF audits (beginning in October 2018) where a deputy in any way prevented a person from recording an incident.				
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 Paragraph 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	Partial	Cat 1 and 2: Yes Cat 3: Yes	Yes
	Notes: The Department is in sustained compliance with Paragraph 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	Partial	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	Partial	Cat 1 and 2: No Cat 3: No	No

TABLE 6					
USE-OF-FORCE COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
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 Paragraph 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	Partial	Cat 1 and 2: Yes Cat 3: Yes	No
	Notes: Paragraph 110b will be assessed in the next MT complaints audit.				
111a–d	Perform thorough UOF investigations.	Yes	Partial	Cat 1 and 2: No Cat 3: Yes	No
111e	Supervisors will thoroughly review deputies' UOF reports.	Yes	Partial	Cat 1 and 2: No Cat 3: No	No
112a	Independent supervisory use-of-force investigations.	Yes	Partial	Cat 1 and 2: Yes Cat 3: Yes	No
112b–e	Supervisor's UOF investigation reports will be complete.	Yes	Partial	Cat 1 and 2: No Cat 3: Yes	No
113	Management will review thoroughness of UOF investigations.	Yes	Partial	Cat 1 and 2: No Cat 3: No	No
	Notes. As it relates to Paragraphs 113–118, during this reporting period the AAB conducted three mini audits associated with these paragraphs. However, the sampling utilized in those audits was insufficient to be relied upon for a compliance determination.				
114	Executive Force Review Committee will thoroughly review Category 3 force.	Yes	Yes	Partial	No
	Notes: LASD has policies in place for the EFRC review process. Ongoing reviews of EFRC processes have shown major improvement. (Paragraph 114 does not apply to Category 1 or 2 uses of force.)				
115	Deputies held accountable for force that violates policy.	Yes	Partial	Cat 1 and 2: No Cat 3: No	No
116	Supervisors held accountable for inadequate investigation.	Yes	Partial	Cat 1 and 2: No Cat 3: No	No

TABLE 6					
USE-OF-FORCE COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
117	AV commanders identify and curb problematic UOF trends.	NA	Unable to Assess	Partial	No
	Notes: NPD's RMF and the AV stations' quarterly reports track uses of force. The station managers are starting to use the POINT risk management system and other dashboards to track force data, with the some of the information included in CMF/RMF meetings. AAB is conducting mini-audits of UOF. The stations have weekly Cat 2 force reviews. The AV captains have begun taking, and documenting, corrective action through briefings, training, supervision, mentoring, and PLEs. The Parties and MT should meet to establish a compliance metric for Paragraph 117. Compliance will require documentation of these analyses and corrective action taken as well as audits to measure outcomes.				
118	LASD and AV unit commanders will regularly review and track "training and tactical reviews."	Yes	Partial	Partial	No
	Notes: The MT has not found any indication that informal supervisory feedback was replacing the need for formal discipline, but the first three UOF 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. Compliance will require further documentation of the tracking process and outcomes, and that audits finding the processes are functioning as intended.				
119	Updated UOF training is provided.	Yes	Partial	Partial	No
	Notes: With an approved UOF policy, the Department must now develop and implement an approved UOF training. 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. Meanwhile, deputies continue to take the current UOF training, which addresses some of the new UOF policy. Since the newly approved CEW/Taser training addresses several of the same topics, the MT has found the Department in partial training compliance.				
120	LASD to conduct an annual analysis of UOF data and trends and correct deficiencies identified by the analysis.	NA	NA	Partial	No
	Notes: With the Quarterly Reports, POINT risk management system, and other dashboards, and with the CPE analysis, the Department has begun to regularly review UOF data for individual deputies and units. To reach compliance, the stations will have to document their reviews to include the analysis conducted and findings; station managers' assessment of the findings, including any trends and deficiencies identified (or lack thereof); any corrective action taken; and outcome of that action.				

TABLE 6					
USE-OF-FORCE COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENTS	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
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 stations have continued to expand and improve their regular review of force data using the POINT risk management dashboard and other sources of data and information. To reach compliance, the stations will need to document their use of data as described above in the notes for Paragraph 120, including documentation of the specific reviews listed in SA Paragraph 121, e.g., frequency and nature of force incidents that are referred to Internal Affairs, that involve misconduct complaints, etc.				
122	LASD to assess whether changes to UOF policy or training are needed based on analysis.	NA	NA	Partial	No
	Notes: The stations have begun using force data to determine whether any changes need to be made to policy or training. To reach compliance, the stations will need to document these reviews, to include the analysis conducted, the findings that revealed potential issues (or the lack thereof), actions taken, and the outcomes of those actions.				
123	LASD to produce annual public report on UOF data and trends.	NA	NA	No	No
	Notes: The parties have discussed the type of documentation and reporting that will be required for LASD to gain compliance with Paragraph 123, which at minimum would include a public report showing the documentation of UOF data analyses conducted and results, Department assessments of those findings, and any corrective action taken. See also the notes for Paragraph 120.				

Table Notes

- The MT has done three audits of the lesser uses of force (Categories 1 and 2) and one audit specifically examining the most serious use of force (Category 3).²⁸
 - » Category 1 and 2 Audits: October 2018, July 2021, November 2023
 - » Category 3 Audit: November 2019
- In 2018, Category 1 force was split into two categories: non-categorized force incidents (NCIs) and Category 1; the definition of Category 1 remained the same except that the lowest levels of force were now categorized as NCI. The MT's first Categories 1 and 2 audit (2018) was conducted before this change. The second MT Categories 1 and 2 audit (2021) addresses NCIs and Category 1 separately but combines them in determinations of compliance. Any reference to Category 1 in this semi-annual report includes NCI unless otherwise indicated.

²⁸ Our first use-of-force audit included the available Category 3 uses of force during the audit sample period. During that audit we learned that an entirely different audit process would have to be used to evaluate the Department's Category 3 cases. Since that time, we have evaluated Category 3 cases as they are adjudicated by an Executive Force Review Committee.

H. Personnel Complaint Review

High quality AAB audits and responsiveness to those audits by the AV station captains led to significant progress on compliance in the Complaints section.

Unfortunately, the complaint policies approved in 2021 remain in the “meet and confer” process with labor unions and SA Paragraph 134 is no longer in compliance, but several other provisions have made progress on compliance.

- Monitors determine a positive change in compliance for eight provisions.
- LASD has been found in compliance for conducting its own semi-annual complaints audits (SA Paragraph 140a), and, for the first time, the MT has included LASD audits in our assessments of compliance.
- LASD has been found in compliance with provisions regarding the intake and processing of complaints (SA Paragraphs 124, 125b, 126, 128, 132, 137a, 140a) and in sustained compliance with two other provisions (SA Paragraphs 133 and 137b).

1. LASD Complaint Policies

- The Department remains out of compliance with the SA requirement that complaint policies be revised to ensure they are complete, clear, and consistent (Paragraph 127) and that Department policy identify which allegations require formal discipline, which require a full administrative investigation and which must be investigated by IAB (Paragraph 129).

With certain caveats, the Monitors and DOJ agreed to the publication of a revised Manual of Policies and Procedures (MPP) chapter on complaints along with a new Service Comment Report Handbook and Administrative Investigations Handbook.²⁹ We also agreed to address the Paragraph 129 requirement to identify the allegations that would require discipline, the types of complaints that must be handled as an administrative investigation, and the investigations that must be conducted by IAB rather than the

²⁹ 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 nondisciplinary 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 noncompliance with SA Paragraphs 127–132. Second, some complaints are currently assessed with abbreviated investigations called 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 that 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.

stations during our review of the Department's Guidelines for Discipline and Education-Based Alternatives. Those agreements were reached on November 3, 2021. Three years later, those policies still have not been implemented. None of the three documents has been published, no updated training has been provided, and revisions to the Guidelines for Discipline have not begun. We realize there has been a change in Department leadership and other priorities have arisen, but the Department should finish this work to bring its disciplinary system in line with contemporary law enforcement standards.

2. Complaint-Related Training

- The Department remains in partial compliance with the SA's complaint-related training provisions (SA Paragraphs 138–139).

Training on the new complaint process remains on hold pending publication of the Department Manual section, the Service Comment Review Handbook, and the Administrative Investigation Handbook. The Department will submit a curriculum to train its supervisors and managers on the revised process when they are ready for implementation.

3. LASD AAB Audits of Complaints

- The Department is now in compliance with conducting semi-annual complaints audits (SA Paragraph 140a).

The Department has achieved compliance with the SA Paragraph 140 requirement that the Department conduct semi-annual audits of personnel complaints.

In our last report, we found that the Department's Audit and Accountability Bureau (AAB) has demonstrated increased attention to the SA's auditing requirements and made significant efforts to produce reliable, useful, and actionable audit reports. AAB has sent its key personnel to a highly respected audit class designed specifically for law enforcement agencies. AAB is also working closely with MT subject matter experts who provide technical assistance on planning, conducting, and reporting the AAB audits. As the MT has previously done for some audits at the request of LASD, AAB is using smaller, strategically selected samples to test particular objectives rather than undertaking wide scope audits. As a result, AAB has conducted more narrowly focused audits and has been able to produce their audit reports much more quickly than in the past and thus provide Department managers with timely insight into the stations' level of compliance with SA requirements. Notably, AV station managers have come to rely on those AAB audits to assess their progress toward compliance while continuing with their efforts to improve their practices.

In July 2024, AAB published a detailed audit of public complaints that occurred in the AV during 2023. The MT found this audit to be significantly improved as compared to any of AAB's prior complaint audits as it followed the methodologies laid out in the approved audit plan, and the report thoroughly described all methods and results. The MT conducted its own review of the cases in the audit and found the AAB report provided accurate and reliable findings and thoughtful recommendations for corrective action. The MT met with AAB and the station captains to review the audit. The audit outcomes will be

addressed below,³⁰ but with respect to the audit itself, the MT identified two areas that needed attention. First, the auditors lacked a procedure for addressing misconduct discovered during an audit. In this case, auditors discovered that several field sergeants failed to take action upon becoming aware of alleged misconduct. The MT suggested, and AAB has adopted, the issuance of an Interim Audit Report (IAR) to notify the division commander and station captain any time unaddressed misconduct is identified during an audit. Second, the audit did not assess the appropriateness of any corrective action taken or not taken when an employee is found to have committed misconduct. AAB will add this to their future audit plans.

In September 2024, AAB published a second complaint audit, which focused on determining whether corrective actions identified in AV 2023 complaint investigations were completed and if recommendations from prior AAB and MT complaint audits have been implemented (Audit 2023-8-A). This second audit was also very well done.

This is the first time in nine years the Department has met the requirement to conduct semi-annual audits of public complaints. Through our continued regular communications and collaboration with the AAB, it appears the Department is on track to repeat this accomplishment in the coming year, which would establish sustained compliance with SA Paragraph 140.

4. Status of the Department's Complaint Process

Since the MT has found the recent AAB personnel complaint audits to be reliable and thorough, we are including AAB audit results as part of our rationale for determining compliance for some SA provisions.³¹ We would have taken the AAB audits into consideration for a greater number of provisions if not for a significant backlog of long overdue personnel and use-of-force investigations inherited by the current AV station captains, which limited the reliability of some of the AAB audits. After nearly a year of diligent work, the stations have largely eliminated the backlog with the exception of Lancaster's complaint investigations. But the remaining backlog in Lancaster inhibits AAB's ability to select contemporaneous and unbiased audit samples, which preclude the audits from being used by the MT for formal assessment of compliance with most other SA complaints provisions. There are also other significant practical concerns with delayed investigations, including community members waiting long periods for resolution, deputies potentially not being disciplined in a timely manner for years-old cases, and Department managers not being able to accurately track deputy and station risk management trends. The AV station managers recognize that the backlog must be eliminated and that both stations need to stay current in submitting these investigations in the future.

The backlog described above notwithstanding, the MT has found that AV station managers are improving their investigation and processing of public complaints. They are complying with many of the more routine SA requirements almost without exception. In fact, based on previous MT audits, other MT

³⁰ SA Paragraph 140 requires that LASD *conduct* internal audits; the *results* of AAB (and MT) audits are measured in other paragraphs.

³¹ SA Paragraph 149 states: "Where appropriate, the monitor will make use of audits conducted by [AAB,] taking into account the importance of internal auditing capacity and independent assessment of this agreement."

reviews of investigations and station paperwork, and AAB's recent audits, the MT found during this reporting period that LASD is now in compliance with the following.

- The public is to be provided ready access to complaint materials (SA Paragraph 124).
- Individuals with limited English proficiency are provided complaints materials in appropriate language or translation (SA Paragraph 125b).
- Impeding a complaint is grounds for discipline (SA Paragraph 126).³²
- Personnel complaints are not misclassified as service complaints (SA Paragraph 128).
- Appropriate cases are referred to the Internal Criminal Investigations Bureau (ICIB) or IA (SA Paragraph 132).
- Uninvolved supervisors conduct personnel investigations (sustained compliance; SA Paragraph 133).
- Witnesses are interviewed separately (SA Paragraph 137a).
- Uninvolved interpreters are used when needed (sustained compliance; SA Paragraph 137b).³³

Meanwhile, four areas related to complaints remain particularly problematic.

- The Department had been in compliance with SA Paragraph 134 regarding investigators identifying everyone at the scene that had given rise to a misconduct complaint, but AAB found non-compliance with that provision.
- Supervisors and watch commanders are not consistently initiating complaint investigations when they should (SA Paragraph 125). AAB auditors reviewed the body-worn camera recordings for supervisors who were on scene when a complaint occurred, and in every case the person complained to the field supervisor but nothing was done. Additionally, auditors reviewed phone calls recorded on the watch commander's line and found several cases in which a person clearly made a complaint but the watch commander did not initiate a complaint or make a log entry as to why not.
- Investigations are not consistently thorough enough to support reliable findings (SA Paragraph 131). Only 75% of the AAB audited investigations met this standard. That not only renders the investigation non-compliant, but the ensuing adjudication as well.
- Adjudications do not consistently meet the preponderance of evidence standard (SA Paragraph 140b). The MT audits found the Department out of compliance with this requirement and the AAB audits showed that only 71% of the investigations audited met the preponderance of evidence standard.

The AAB also found that Department managers were not heeding the recommendations made in MT and AAB audits: less than half of the AAB and MT audit recommendations had been implemented.

³² Recent MT and AAB reviews and audits found no indication that LASD personnel impede the filing of complaints, so the MT finds the Department in compliance with SA Paragraph 126.

³³ LASD also achieved partial training compliance regarding collection of relevant evidence being provided (SA Paragraph 139).

Notably, nearly all of the incomplete recommendations involved the need to undertake Department-wide structural improvements, including publication of the revised manual section on complaints, SCR Handbook, and Administrative Investigations Handbook (discussed above).

The MT expects the AV management teams will address and correct these deficiencies. There is clearly work left to reach compliance with some of the most important complaints provisions, including implementing approved policies and training, but they have come a long way in the past year, and there has been a notable increase in the number of SA provisions in compliance. A strong partnership has been built between AV managers and the AAB. In fact, at the November on-site meetings, one of the Palmdale captains indicated that he missed AAB's audit input during the time period when AAB was concentrating on conducting a supplemental audit of Lancaster's recently completed cases. That says volumes for the AV captains' openness to critiques as well as their desire to provide the AV community with quality law enforcement services. It also speaks highly of the added value AAB is now providing in their audits.

5. MT Monitoring of Public Complaints

Members of the public brought two complaints to the Monitors' attention this period. One complaint was about an incident that occurred in the City of Industry, with no connection to the AV. The other involved a complex landlord/tenant dispute and allegations that sheriff's personnel were discourteous. Our review of the case included six calls the complainant made to the station on a recorded line. In one call the deputy's behavior should have remained more professional, and corrective action was taken. In all six calls, the complainant's demeanor and language was highly abusive. The MT concluded this complaint was appropriately adjudicated by the Department.

6. Successes and Obstacles

The Monitors continue to await revisions to the Guidelines for Discipline, the publication of the revised SCR Handbook, Department Manual, and Administrative Investigations Handbook, and development and implementation of an approved training. A highlight of complaints-related work in this reporting period was AAB's hard work to produce regular and reliable audits for personnel complaints and their work with the station captains to ensure those audits help facilitate improvements in the intake and handling of complaints. This is the first time the Monitors have found the LASD audits sufficient to assist in determining compliance. While the MT plans to conduct its own follow-up audits, it represents important progress that the Department is establishing internal review processes that will help ensure progress made under the SA will continue into the future. Meanwhile, we are hopeful that the partnership between the AV station captains and AAB, along with other changes at the stations, including use of the POINT risk management dashboard, which includes complaint information, and progress with PMP (see the Accountability section), will soon bring complaints into compliance with the SA's requirements.

7. Next Steps

a. *LASD*

- Eliminate the backlog of complaint investigations in Lancaster, and prevent any backlogs from occurring in the future.
- 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.
- Continue to conduct audits that evaluate compliance with SA requirements.
- Hold supervisors and watch commanders accountable for failure to initiate a personnel complaint investigation when appropriate.

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.
- Provide AAB with technical assistance as needed.
- Review AAB's audits of public complaints and determine whether they can be used to assess Department compliance with the SA's complaint requirements (Paragraph 149).

8. 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	Yes 12/24	No
	Notes: During a site visit in early 2024, the MT documented that complaint forms were available at six of seven locations. AAB audits have confirmed that the required material is regularly made available to the public in the AV.				
125a	Accept all complaints.	Partial	Partial	No	No
	Notes: LASD was not in compliance with regard to accepting all complaints in either MT audit. AAB audits found that field sergeants did not initiate a complaint upon becoming aware of alleged misconduct. Additionally, several watch commanders did not initiate a complaint when required.				
125b	LEP language assistance.	Partial	Partial	Yes 12/24	No
	Notes: The requirement of providing language assistance was not in compliance for the first MT audit but was in compliance for the second audit. AAB audits also found compliance with this provision.				
126	Impeding the filing of a complaint is grounds for discipline.	Partial	Partial	Yes 12/24	No
	Notes: The second MT audit and subsequent MT reviews, as well as the AAB audits, did not identify any instance in which a Department employee impeded the filing of a complaint.				
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.				
128	Ensure personnel complaints are not misclassified as service complaints.	Partial	Partial	Yes 12/24	No
	Notes: LASD was found to be in compliance for the first MT audit but not in compliance for the second MT audit. AAB audits have shown compliance with this requirement.				
129	Revise policies for allegations requiring IAB investigation and behavior requiring formal discipline.	No	No	No	No
	Notes: This is awaiting publication of the other three directives followed by revisions to 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: This has been a critical shortcoming in every audit.				
132	Refer appropriate cases to IAB or ICIB.	Partial	Partial	Yes 12/24	No
	Notes: Compliance could not be determined in the first MT audit because there were no relevant cases in the audit population. There were two such cases in the second MT audit, and neither one was referred as required. AAB audits have not identified any complaints that should have been referred to IAB or ICIB and were not.				
133	Investigation conducted by uninvolved supervisor.	Partial	Partial	Yes 12/15/20	Yes 12/24
	Notes: The second MT audit and the AAB audits have shown that an uninvolved supervisor is consistently being assigned to conduct complaint investigations.				
134	Identify all persons at scene.	Partial	Partial	No	No
	Notes: Prior MT audits had found the Department in compliance, but AAB audits have shown this is only being done in 63% of the cases audited.				
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.				

TABLE 7					
PERSONNEL COMPLAINT REVIEW COMPLIANCE STATUS					
SA PARAGRAPH	SUMMARY OF SA REQUIREMENT	COMPLIANCE			
		POLICY	TRAINING	IMPLEMENTATION	SUSTAINED
137	Interview witnesses separately.	Partial	Partial	Yes 12/24	No
	Use uninvolved interpreter for people with LEP.	Partial	Partial	Yes 12/15/20	Yes 06/24
	Notes: Recent MT reviews and AAB audits have shown that witnesses are being interviewed separately and that an uninvolved interpreter has been provided consistently when needed.				
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.				
140a	Conduct semi-annual audits of public complaints.	Yes	Yes	Yes 12/24	No
	Notes: The Department conducted and published two approved complaint audits in 2024 (of complaints occurring in 2023), bringing it into compliance with this paragraph.				
140b	Complaint dispositions are consistent with preponderance of evidence standard.	Partial	Partial	No	No
	Notes: MT and AAB audits found the Department out of compliance with the requirement that adjudications meet the preponderance of evidence standard.				

I. Accountability

The overhaul of the PMP program and the development of internal dashboards for use by managers has led to progress on compliance in the Accountability section.

- In this reporting period, LASD reached partial compliance with SA Paragraphs 144 and 145 regarding the PMP program.
- The MT also found LASD in compliance with Paragraph 141a concerning the use of PRMS as a Department-wide decision support system and having an alternative process for conducting peer-to-peer and unit reviews.

1. Quarterly Reports

- LASD remains in partial compliance with SA Paragraph 141b regarding unit commanders and supervisors conducting periodic reviews of all deputies and units.

The AV captains have spent a great deal of time in their first year reducing the extremely large backlog of use-of-force and complaint investigations they inherited. Both stations are almost completely caught up with their use-of-force backlog. Lancaster complaints remain the only hurdle to eliminating the backlog completely. As audit samples can only be drawn from completed cases, eliminating the backlog completely is critical so audits and other managerial (and MT) reviews can use contemporaneous samples in their compliance determinations.

The Quarterly Reports were designed to meet the SA Paragraph 141 requirement for periodic review of all deputies and units (SA Paragraph 141a). During this period, the MT has reviewed the quarterly reports for the fourth quarter 2023 and first quarter 2024, which the Department provided in late September. These reports for each station were generally thorough and provided good insight into patterns of force and personnel complaints, stops, and obstruction arrests. Divisional review was limited due to a long-term commander vacancy and the NPD Chief being newly assigned to that post during the Q4-23 and Q1-24 time periods. We have provided initial feedback and scheduled an in-person meeting with the AV station captains to discuss our findings and provide any TA the stations may request. We will complete our in-depth review of all these reports in the next reporting period.

Meanwhile, we continue to be concerned that many deputies appear on these reports for force incidents classified as Non Categorized Force Incidents (NCIs).³⁴ 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 and this information needs to be tracked, 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 the sheer number of deputies listed in the reports 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

³⁴ NCI force involves the use of force involving takedowns or the use of oleoresin capicum (OC) spray when there is no injury.

(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.

The Quarterly Reports as currently designed were meant as an interim measure until the Department procured and/or developed modern records management systems that would enable much more efficient report preparation, review, and tracking. We are hopeful that the new online risk management dashboards (POINT) and, eventually, the new records management system the Department intends to procure can be used to automate much of the work and thus dramatically reduce the time required to prepare these quarterly reports. Early in the next reporting period, the MT and station captains will meet to discuss the status of the quarterly reports and what will be needed for the Department to reach compliance with these provisions.

2. Performance Mentoring Program

- The Department is now in partial 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 having been established at either AV station and inconsistent delivery and outcomes. The Department's long-standing approach to identifying and managing at-risk employees was for the Risk Management Bureau (RMB) to provide station managers with a quarterly list of deputies who met certain criteria based on an antiquated "Sheriff's 11" report. Station managers then evaluated those employees and provided RMB with recommendations on which employees should be placed on unit or Department performance mentoring. This "top down" approach did not hold managers accountable for identifying and addressing their at-risk personnel. Also, line-level managers had no access to automated systems that would provide ongoing real-time data on the behavior and performance patterns that could be established and monitored for either individual employees or work groups. Another factor that has inhibited effective management oversight has been that only completed investigations—approved by the division chief and entered into PRMS—are contained in the Sheriff's 11 reports, and some of these can take several years to complete.

During this reporting period, the Department has completely revamped its approach to performance mentoring. Progress has been very evident in recent months. The changes, which apply Department-wide, include revising its internal PMP directives and automating access to risk-management information. Throughout this remodel, the MT has continued meeting with RMB and OCP's Performance Mentoring team as well as the PMP Panel commanders, who oversee the program and make decisions on deputies placed on Department-level PMP. The Monitors have been impressed with the PMP team's commitment to improving the entire PMP process.

One of the major changes to PMP is the shift in using data based on completed investigations to identify patterns of concern to now relying on information entered during Preliminary Data Entry (PDE). Unlike the old system, which used reports of events that were often several years old, PDE captures most events within a day or two of occurrence. This provides a much more robust and timely view of

emerging risk management concerns.

The Department has also developed a suite of applications to assist in identifying employees in need of timely mentoring and in tracking those on PMP. Both Antelope Valley stations are now piloting the application suite and the revamped performance mentoring process. In a parallel development, the AV station captains have also greatly improved their tracking of data and risk management issues (in part by using the new dashboards described in the Stops, UOF, and Complaints sections) and are more consistently holding their staff accountable, which helps ensure that the mentoring program is effectively used as one of an array of options to help guide and support deputies.

Another major change relates to the development of an efficient and robust electronic process to monitor the entire PMP process. The new automated system tracks an employee/mentee through every stage of the program, with accountability built in for each role: mentor, mentee, unit commander, division commander, and PMP Commander's Panel. Performance measures and progress notes are recorded at each stage. The Department has also created a dedicated mentoring resource site which contains training aids and guides.

The PMP manual has been completely revamped, and five supporting documents developed, including:

- PMP Reference Guide;
- PMP User Guide;
- PMP Scripts, which help promote consistency during PM meetings and standardize workflow;
- PMP Commander Panel User Guide; and
- Unit Commander Presentation Outline, to ensure all relevant issues are addressed.

The Monitors and DOJ are reviewing and providing input on those documents. We summarize some of their key elements here.

The Risk Management Bureau continues to coordinate both unit-level and Department-level performance mentoring using the PMP application suite to track each case, which is also monitored by the commander's panel. Deputies identified as needing additional supervision and guidance may be placed on unit-level or Department-level mentoring.

An employee on unit-level mentoring participates in PMP for a minimum of six months, not to exceed one year. Along with expanded supervisorial engagement, the employee is scheduled for a minimum of two training sessions in their identified area of need and is also scheduled to participate in at least one community engagement event. Completion of those requirements is tracked in the automated PMP system. If an employee on unit-level PMP continues engaging in risky behavior, the commander's panel can elevate them to Department-level PMP.

Department-level mentoring is more rigorous than unit-level mentoring, as it requires the employee to engage in a minimum of four training sessions in their identified area of need and a minimum of four community engagement events. Participation in the Department-level mentoring program is for a minimum of one year but not exceeding two years.

Unit-level and Department-level mentoring conclude with a Completion Assessment conducted by the mentor, a mentee survey of the mentoring program, and an exit discussion between the mentee and the unit commander. Placement in unit- or Department-level performance mentoring or a determination of successful completion of the mentoring program only occurs with the final approval of the commander's panel.

In addition to these improvements to the PMP program, each AV station has assigned a sergeant as the station's full-time PMP coordinator. This is an excellent measure to ensure that deputies receive the attention and support they need. The AV stations are also prioritizing supervisor consistency for deputies on PMP—an important culture shift.

Compliance with this provision will require the finalization of the new handbook and related documents and then evidence of its functioning well and producing the outcomes intended, which will require audits of the program in the AV after it has had time to function for an appropriate amount of time. We welcome these improvements in this critical area and will be evaluating their effectiveness during the upcoming reporting periods for a compliance assessment.

3. Coveted Positions

In our last report, we reiterated our concern regarding the number of AV deputies with concerning risk-management patterns who are also in prestigious assignments, most notably detectives and FTOs. That pattern continued this period, with several deputies with a concerning performance history moving into detective assignments. We look forward to hearing what that review shows as well as any solutions that may be suggested.

4. Successes and Obstacles

With the assignment of four new captains to the AV and a new division chief, an immediate priority has been to focus more attention on clearing out the large backlog of overdue complaint and use-of-force investigations. That is the unfortunate reality of incoming managers being assigned to a command and having to confront areas that have been neglected by prior leadership. 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 from supervisors and managers. More important, they are redirecting supervisors and lieutenants to address marginal behaviors by their subordinates.

Revising the PMP program has been a dramatic improvement. We recognize and commend the Department for its efforts in this area. We especially commend the Department for making risk management information available to line commanders. Already they are using that information in creative ways, such as identifying and showing supervisors when errors are part of a pattern of conduct rather than isolated instances.

5. Next Steps

a. *LASD*

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

b. *The Parties and MT*

- Review the PMP directives and provide the Department with feedback.
- 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.
- 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
141a	<ul style="list-style-type: none"> PRMS serves as LASD-wide decision support system. Modify system to allow peer-to-peer comparisons of deputies and units. 	Partial	Partial	Yes 12/24	No
	Notes: PRMS is used Department-wide. The new dashboards provide for peer-to-peer and unit comparisons. LASD is currently discussing the thresholds for informing peer-to-peer comparisons and may be providing updates to policy and protocols next reporting period. This demonstrates that LASD recognizes that, although compliance may be achieved, further improvement is still expected.				
141b	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 find them in partial compliance. The MT will be meeting with the station captains early in the next reporting period to clarify what will be required to reach 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. Regarding data accuracy, the Monitors have found the Department in partial compliance because LASD has various important data checks in place and because some aspects of the data held have been shown to be reliable. However, in their recent audit on accuracy of PRMS, AAB determined 71% accuracy for critical information on SCR forms and 54% for noncritical information.				
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, RMFs, UOF and complaint reviews, the 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.	Partial	Partial	Partial	No
	Notes: The Department has completely revamped its PMP process, including rewriting the PMP handbook. The MT has provided feedback on further refinement to the handbook; when finalized, LASD will be in policy compliance with this provision. The MT will assess the need for formalized training for station staff responsible for the PMP, including managers and supervisors. Meanwhile, the programmatic changes have been implemented in the AV, and we look forward to evaluating their effectiveness.				
145	Coordinate between Department-wide and unit PMP.	Partial	Partial	Partial	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: USING DATA TO INFORM PRACTICE: SUGGESTIONS FOR LASD MANAGERS

This appendix provides discussions that were included in previous MT semi-annual reports as guides and demonstrations of the steps and thought processes involved as NPD and station commanders assess data and apply what is learned to improve policing in the AV and to meet SA requirements. The selections use probation and parole status, backseat detentions, and potential disparities across various stops outcomes as examples.

The dashboards make data and information readily accessible to NPD and station managers as they continue to expand and routinize their use of data to inform and improve practice. They can now much more efficiently assess, for instance, whether specific, articulated strategies are effective; whether certain units, shifts, or supervisors or some other Department entity seem to affect certain groups more than others; or whether a particular policing strategy has unintended consequences, such as reduced community trust in law enforcement. If the data show a disparity in enforcement (or other concerning patterns), commanders should identify and review the activities leading to the disparity or other issue, weight the efficacy of the practice against its costs, consider alternatives, and provide direction to staff to mitigate the disparity or other issue, where appropriate. Regular analysis and engagement with the stops data are core components of constitutional policing.

A. Applying the Results of Data Analysis to Inform Practice: Probation/Parole Status³⁵

SA Paragraph 46 states:

LASD-AV shall collect and analyze data related to searches based on probation or parole status. LASD shall assess the efficacy of this tactic and its impact on the community and make policy changes accordingly.

Additionally, SA Paragraphs 44, 56, 57, 81, 82, 83, and 153 each specifically address issues related to probation and parole status, including asking individuals if they are on probation or parole, conducting searches based on that status, and recording information about and conducting analyses of those interactions. It is also a factor in other SA paragraphs, such as:

LASD agrees to deliver police services that are equitable, respectful, and bias-free, in a manner that promotes broad community engagement and confidence in the department. (Preface to Bias-Free Policing section, SA p. 13)

In conducting its activities, LASD agrees to ensure that 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

³⁵ This section was originally an appendix to the 11th Semi-Annual Report, available at <http://www.antelopevalleysettlementmonitoring.info/>

protected by the Constitution or laws of the United States. (Paragraph 64)

In short, LASD must regularly review data to assess the efficacy and impacts of conducting searches based on probation and/or parole status during stops and is thus not in compliance with Paragraph 46. Paragraph 83 also requires the Department to determine whether they are asking about a person's probation or parole status in a race neutral manner.

At several points over the monitoring period, the MT has discussed with station commanders the steps they can take to begin carrying out these and other important reviews. These steps are similar for any provision or any issue that the Department wishes to address. They include the following.

1. Understand the purpose and scope of the issue (in this case, defined by the SA provision).
2. Compile data and contextual information on the issue.
3. Review those data and that information.
4. Develop goals and specific corrective action for addressing any problematic findings.
5. Implement that corrective action and monitor its progress, including making any adjustments based on ongoing tracking and including holding personnel accountable to the goals.

The MT recognizes that circumstances arise in law enforcement that provide reasonable justification for asking a person about their probation/parole status, but it can still be counterproductive and damage community relationships when the question is asked simply as a matter of course and without recognizing that it can be unwarranted and inappropriate in many situations. It is crucial that station managers review these practices and their consequences because they can undermine perceptions of LASD's legitimacy and foster distrust within the community. Asking AV community members if they are on probation or parole has been an issue since the outset of the Settlement Agreement and continues to be so.

Using CAD data provided by the Department, the MT constructed the following data review related to probation and parole status from January to June 2020. It is meant to demonstrate the type of data analysis and assessment that managers can make regarding probation and parole status.

Managers should look at the results of data analysis from the perspective that assessing the efficacy of routinely conducting searches based on community supervision status is important because, while it can be a legal and viable policing strategy, the practice can also erode community-law enforcement relations. The question alone can be off-putting, especially for those who are not, in fact, on probation or parole.

1. Overall Trends

The percentage of people stopped who are asked if they are on probation or parole is increasing.

- In the first half of 2020, nearly two thirds of people stopped (63.7%; 10,737 of 16,850) were asked about their probation or parole status.
- This is a substantial increase over two years, from 53.3% in the second half of 2019, 49.4% in the

first half of 2019, and 39.2% in the second half of 2018.

- This increase was experienced by each race/ethnicity group, somewhat more by Latino and White people (increase of 25 percentage points, respectively) than Black people (23 percentage points).
- Several individual deputies were found to ask the question during almost every stop.

2. Asking the Probation/Parole Question by Race/Ethnicity

Among people stopped in each race/ethnicity group, Black people were substantially more likely to be asked about their probation/parole status (Black 68.7%, Latino 62.8%, White 58.7%).

- The percentage asked this question across the races/ethnicities increased the most among Black people during the most recent period (that is, the difference between the second half of 2019 and the first half 2020). That increase was 12 percentage points for Blacks, 10 for Latinos, and 8 for Whites.

The answer to the probation or parole status questions is overwhelmingly “no.”

- Of people asked about probation/parole status, just 15.7% (1,685) responded “yes” that they were on probation or parole while 84.3% (9,050) responded “no.”
- The rates of affirmative response have not demonstrated the same pattern of growth over the past two years as the rates of being asked about probation and parole status.
- *Notable Trend:* Despite Black people being asked about probation/parole status most often, the percentages responding “yes” (i.e., that they were on probation or parole) were very similar across race/ethnicity groups (Black 16.3%, Latino 15.4%, White 15.4%).

3. Searches Conducted as a Condition of Probation or Parole

“Condition of Probation/Parole” is the most common reason cited by deputies to conduct a vehicle search.

Seventy percent (1,171) of 1,685 people who were asked about their probation/parole status and responded “yes” had a person and/or vehicle search done as a condition of their parole.

- Of 1,685 people who were asked about their probation/parole status and responded “yes,” 1,034 (61.4%) had a person search and 822 (48.8%) had a vehicle search.

Black people were the most likely to be subject to a search among single-person stops³⁶ where the

³⁶ Analyzing single-person stops provides for a more direct understanding of vehicle search reasons as they pertain to an individual rather than to multiple passengers.

individual had an affirmative response when asked about probation/parole status.

- Overall, 436 (40.3%) of those answering “yes” had a vehicle search as a condition of their probation/parole.
- In all, 43.6% of Blacks, 39.9% of Latinos, 33.5% of Whites who responded “yes” had a vehicle searched.

4. Contraband Seized After Probation/Parole Search

Black people were less than half as likely to have contraband seized following a search conducted as a condition of probation or parole.

- Of the 1,171 people who responded “yes” when asked about their probation/parole status, 16.6% (194) were involved in a stop where there was a search and contraband seized.
- The data show that 9.4% of Blacks, 21.2% of Latinos and 19.3% of Whites were involved in a stop where contraband was seized after a probation- or parole-based search.

In summary, Black people were most likely than other races/ethnicities to be asked the probation parole question, about equally as likely to say “yes,” were most likely to be searched, and were least likely to have contraband seized.

B. Applying the Results of Data Analysis to Inform Practice: Backseat Detention³⁷

It is incumbent on LASD to understand where and why disparities are occurring in its enforcement activities and to determine how to best address them. Only through reflection on and analysis of its law enforcement strategies and practices can the Department determine critical intervention points where disparities can be addressed. This does not mean any particular enforcement actions should necessarily cease, but enforcement strategies must be questioned and scrutinized and adjustments considered. The determination as to the efficacy of any specific police practice should, among other factors, consider the impact it has on public safety *as well as* community trust in the Department—with the awareness that real or perceived disparate treatment can have a significant negative impact on community trust in law enforcement and that a lack of trust between the Department and the community can, in turn, hinder safety and effective law enforcement.

Backseat detentions are an important consideration in the SA, specifically addressed in Paragraphs 44, 47, 48, 49, 57, 81, and 153, and they are a factor in reviews and analysis discussed in several other provisions.

As an example, a finding in the disparity analysis was that Black people are more likely to experience a

³⁷ This section was originally an appendix to the 12th Semi-Annual Report, available at <http://www.antelopevalleysettlementmonitoring.info/>

backseat detention than Latino and White people are. To gain an understanding of the circumstances leading to backseat detentions and to make an assessment of the legitimacy of those actions, station managers and their staff can perform a number of inquiries, such as the following.

- Review the stops disparity analysis and trends analysis.
- Conduct their own review of the stops data, including the narrative describing the reasons for each backseat detention, and arrest reports to look for patterns or anomalies.
- Explore the data to see whether backseat detentions—and specifics on the reasons for the detention—happen more often during certain types of stops, or in certain reporting districts, or certain times or shifts, or when certain deputies are involved.
- Interview deputies and their supervisors for context and thought process.
- Review the outcomes of stops involving backseat detentions to track what valuable law enforcement objectives are being met.
- Review community input on the matter through the community survey, CACs, community meetings, and planned and ad hoc conversations with community members.
- Review complaints, uses of force, and other cases involving backseat detentions.
- Review policy, training, and supervision concerning the matter.
- Gather feedback from respected subject matter experts about observed trends and possible interventions.

With this information, important questions can begin to be answered: Are the findings explained and not an issue to be concerned about? Do law enforcement objectives justify a negative impact on community trust? Could adjustments be made to meet law enforcement objectives yet reduce some of the negative impacts? Are there characteristics of certain deputies or shifts or types of stops that unnecessarily increase the use of backseat detentions? Are there issues in the community or physical environment that contribute to the backseat detentions? Are adequate policy controls in place to manage when backseat detention occurs?

Depending on the answers to these questions, station leadership can then develop a plan to address any existing disparity. This could involve several options.

- Revised policies or directives.
- New elements of training, supervision, or mentoring.
- Setting expectations of when backseat detentions should and should not be used (with tracking to hold deputies and their supervisors accountable to the expectation).
- Setting goals for reducing the use of backseat detention by a certain percentage in a certain time period (again with tracking to assess results).
- And, if initial interventions do not achieve goals, consider the Performance Mentoring Program or other supervisory options such as temporary reassignment to remove staff from the environment and/or participation in an assignment to develop their ability to make better enforcement decisions.

The MT also recommends that the Department be inclusive and transparent about this process, sharing

the data and communicating its goals with community members and LASD personnel so as to increase understanding of the Department's commitment to improving law enforcement services in the AV and maximize buy-in for any eventual changes.

C. MT Trends Analysis: Stops and Stops Outcomes, July 2018 to June 2021³⁸

The MT stops analysis compared key AV stops data in six consecutive six-month time periods from July 2018 through June 2021: July–December 2018, January–June 2019, July–December 2019, January–June 2020, July–December 2020, and January–June 2021. This represents a cumulative report. The 2018 and 2019 data were first discussed in previous semi-annual reports and with the Parties.

This report provides data and tabulations prepared by the MT meant to provide the Department with data tabulations they can use to address some of the requirements of Paragraphs 43, 44, 46, 50, 51, 56, 64, 68, and others, as well as explore some of the outcomes required in Paragraph 153. It does not include the Department's assessment of what is concerning or encouraging in the tabulations, any further analysis conducted by the Department, any action steps taken by the Department to address earlier findings (July 2018 through December 2020) or the measured impact of those action steps, or planned action steps based on these latest findings. The Department should address that in a separate report.

Each section of this summary provides a table of the primary findings, some summary discussion of those findings, and results of some further analysis (of other available data) of the type the Department may choose to do when it takes on this work internally. In some cases, we also indicate the number of people that the percentages represent. To shed light on potential actual or perceived disparities, these analyses focus on race/ethnicity. (The names of race/ethnicity groups in these analyses reflect the terms used in the data collection process.) The Department has the option to do analyses based on other demographic variables as well.

1. Overall Stops

The number of stops increased by 11% compared with the last six-month reporting period; however, it is considerably lower than the first half of 2019 (Table A1).

- A total of 16,155 stops were conducted in the AV in the first half of 2021, compared with 14,992 stops in the first half of 2020 and 20,484 stops in the first half of 2019 (seasonally comparable time periods).
- Since stops can involve more than one person, the stops in the first half of 2021 represented

³⁸ This section was originally an appendix to the 13th Semi-Annual Report, available at <http://www.antelopevalleysettlementmonitoring.info/>

17,843 individuals stopped.³⁹

- The reason for most stops (more than 89% in each review period) is vehicle code violations.
- Other common reasons in January–June 2021 (and typically in each reporting period) were warrants on license plate (2.0%) and penal code (1.8%).
- The percentage of stops conducted because of reasonable suspicion has been declining slightly, accounting for 1.8% in July–December 2018, 1.4% in the next three six-month periods, 1.1% in July–December 2020, and 1.0% in January–June 2021.
- Among traffic stops for July–December 2020, the percentage of stops for hazardous citations (such as speeding) was 29% Black, 39% Latino, 41% White, and for non-hazardous citations (such as missing license plate), the percentage was 8.8% Black, 10.7% Latino, and 9.4% White.

TABLE A1						
OVERALL STOPS CHARACTERISTICS						
CHARACTERISTICS	JULY – DECEMBER 2018	JANUARY – JUNE 2019	JULY – DECEMBER 2019	JANUARY – JUNE 2020	JULY – DECEMBER 2020	JANUARY – JUNE 2021
Number of stops	16,554	20,484	18,748	14,992	14,513	16,155
Number of people stopped ⁴⁰	18,313	22,485	20,578	16,850	16,056	17,843
Range of stops per month	2,455– 3,191	2,805–4,665	2,485–3,663	1,783–3,227	1,836–2,618	2,208–3,169
Type of Stops						
Vehicle stops	87%	89%	88%	87%	94%	95%
Pedestrian stops	10%	7%	9%	9%	5%	4%
Bicycle stops	3%	3%	4%	4%	1%	1%

Note: In all tables, totals may not add to 100% due to rounding.

2. Stops by Demographics

Latino people account for most stops across the race/ethnicity groups while Black people are overrepresented among stops relative to the general population (Table A2).

- In the first half of 2021, Latino people represented 47% of stops, Black people 31%, White people 19%, Other 2%, and Asian 1%.

³⁹ There are a number of limitations to the data for multiple-person stops. In particular, the data for multiple-person stops do not specifically describe individuals who were only asked for their information for documentation purposes present at the stop or if the person was not free to leave the stop based on a detention.

⁴⁰ The number of people stopped is greater than the number of stops because of stops involving multiple passengers. Also, these do not represent counts of unique people. If one person is stopped multiple times, that person is counted multiple times.

- » The corresponding racial and ethnic proportions in the AV population for this analysis are Latino 48%, Black 17%, White 29%, and Asian 5%.⁴¹
- » Therefore, Black people are overrepresented compared with their proportion in the general population while the other groups are underrepresented.
- These patterns were largely consistent during the two-year review period, although between the first half of 2020 and the second half of 2020, the percentage of stops rose for Latino people (up 5%) and fell for Black people (down 3%). There was little difference between the second half of 2020 and first half of 2021.
- Over the two-year review period, there was a rise in the proportion of stops of men.

TABLE A2						
DEMOGRAPHICS OF INDIVIDUALS STOPPED						
DEMOGRAPHIC	JULY – DECEMBER 2018	JANUARY – JUNE 2019	JULY – DECEMBER 2019	JANUARY – JUNE 2020	JULY – DECEMBER 2020	JANUARY – JUNE 2021
Latino	43%	44%	46%	43%	48%	47%
Black	33%	32%	32%	34%	31%	31%
White	22%	22%	21%	21%	20%	19%
Other	1%	1%	1%	1%	1%	2%
Asian	<1%	<1%	<1%	<1%	<1%	1%
Male	65%	67%	68%	72%	72%	73%
Ages 20–34 years	48%	50%	49%	50%	50%	49%

Note: The corresponding racial and ethnic proportions in the AV population for this analysis are Latino (48%), Black (17%), White (29%), Asian/Pacific Islander (5%), Native American (<1%).

3. Backseat Detentions

Although the differences are small, Black people were most likely to be placed in a backseat detention during a stop, followed by Latino people and White people (Table A3).

- In the first half of 2021, the backseat detention rates were 8.6% for Black people, 8.1% for Latino people, 6.5% for White people, and 7.8% overall. There was a total of 677 detentions of Latino people and 477 detentions of Black people compared with 225 detentions of White people.
- These backseat detention rates have declined slightly since 2018; White people have consistently had the lowest backseat detention rates.

⁴¹ US Census Bureau, American Community Survey, 2019. Census tract-level data from the American Community Surveys of 2014 through 2018 were used to measure the demographic composition of all sheriff-reporting districts in the AV.

TABLE A3						
BACKSEAT DETENTIONS: PERCENT OF PEOPLE STOPPED WHO WERE HELD IN A BACKSEAT DETENTION						
OUTCOME	JULY – DECEMBER 2018	JANUARY – JUNE 2019	JULY – DECEMBER 2019	JANUARY – JUNE 2020	JULY – DECEMBER 2020	JANUARY – JUNE 2021
% held in BSD, all	9.0%	8.5%	7.9%	9.4%	7.1%	7.8%
% held in BSD, Black	10.2%	8.9%	8.6%	9.5%	7.7%	8.6%
% held in BSD, Latino	9.8%	8.7%	8.2%	10.2%	7.4%	8.1%
% held in BSD, White	6.6%	7.9%	6.8%	8.1%	5.9%	6.5%

4. Searches

Black people were more likely than Latino or White people to be searched (person or vehicle) during a stop (Table A4).

- In the first half of 2021, the search rates were 33% for Black, 29% for Latino, 28% for White, and 29% overall.
- While the rates among people stopped are similar, the difference in number of people who experience these outcomes is substantial: Two and a half times as many Latino people (n = 2,419) were involved in a search compared with White people (n = 954), and nearly twice the number of Black people (n = 1,833) were involved in a search compared with White people (n = 954).
- Despite rising search rates since 2018, there has been a decline in search rates since the first half of 2020 for each race or ethnicity. The largest percentage decline was among White people, resulting in larger disparities between Black and Latino people and White people.
- Over the three-year period, Black people were consistently most likely to be involved in a search (person or vehicle).
- Over the first four review periods, the most common reason for a person search was consistently "incident to arrest." However, since the second half of 2020, "condition of parole/probation" was the most common reason (25% of all person searches in the second half of 2020 and 23% in the first half of 2021). The most common reason for conducting a vehicle search has consistently remained "condition of probation or parole" (31% of all vehicle searches since the second half of 2020).

TABLE A4						
SEARCHES: PERCENT OF PEOPLE STOPPED WHO WERE SEARCHED						
OUTCOME	JULY – DECEMBER 2018	JANUARY – JUNE 2019	JULY – DECEMBER 2019	JANUARY – JUNE 2020	JULY – DECEMBER 2020	JANUARY – JUNE 2021
Any search: Stops involving any search (person and/or vehicle)						
% any search, all	26%	27%	30%	36%	31%	29%
% any search, Black	30%	30%	32%	38%	35%	33%
% any search, Latino	25%	26%	28%	35%	30%	29%
% any search, White	23%	26%	30%	36%	30%	28%
Person searches: Stops involving a person search						
% person searched, all	22%	24%	26%	33%	29%	27%
% person searched, Black	25%	26%	28%	34%	33%	30%
% person searched, Latino	22%	23%	25%	33%	28%	26%
% person searched, White	20%	24%	27%	32%	28%	26%
Vehicle searches: Stops involving a vehicle search						
% vehicle searched, all	15%	16%	18%	23%	23%	22%
% vehicle searched, Black	17%	18%	19%	25%	26%	24%
% vehicle searched, Latino	15%	15%	18%	23%	22%	22%
% vehicle searched, White	12%	14%	17%	21%	22%	20%

5. Contraband Seizures

Black and Latino people were less likely to have a stop result in the seizure of contraband than White people (Table A5).⁴²

- In the first half of 2021, the seizure rates were 18% for Black, 25% for Latino, 29% for White, and 23% overall.
- Over the six reporting periods, the rates were the highest in the second half of 2020 and have declined in the first half of 2021.

Notable trend: Black people are consistently most likely to be searched, yet consistently have the lowest

⁴² Due to data system limitations, when multiple people are involved in a stop, it is difficult to determine who was in possession of the contraband or which type of search yielded the discovery of contraband.

incidence of contraband being seized.

TABLE A5						
SEIZURES: PERCENT OF PEOPLE SEARCHED (PERSON AND/OR VEHICLE) WHO HAD CONTRABAND SEIZED						
OUTCOME	JULY – DECEMBER 2018	JANUARY – JUNE 2019	JULY – DECEMBER 2019	JANUARY – JUNE 2020	JULY – DECEMBER 2020	JANUARY – JUNE 2021
% with seizure, all	21%	20%	20%	23%	30%	23%
% with seizure, Black	16%	16%	16%	15%	23%	18%
% with seizure, Latino	24%	22%	20%	25%	32%	25%
% with seizure, White	22%	25%	27%	31%	39%	29%

6. Response to Question of Probation and Parole Status⁴³

Black people were the most likely to be asked if they were on probation and parole during a stop, followed by Latino people (Table A6).⁴⁴

- In the first half of 2021, the rates at which the question was asked were 39% for Black people, 31% for Latino people, 29% for White people, and 33% overall. This statistic declined substantially for all racial/ethnic groups since the first half of 2020, and the overall rate declined by over 30 percentage points.
- Black people were 10% more likely than White people to be asked about their probation and parole status in the most recent reporting period. More than double the number of Black and Latino people stopped were asked about their probation and parole status (2,168 and 2,575 people, respectively) compared with White people (1,020 people).
- Black people and White people were about equally as likely to respond “yes” (22%) and slightly more likely than Latino people (19%) among those who were asked about their probation and parole status.
- Seventy-four percent (888 people) of the 1,197 people who were asked about their probation/parole status and responded “yes” had a person and/or vehicle search done as a condition of their parole. There has been a steady increase from the first reporting period in

⁴³ A person’s response to this question may not be indicative that the person is, in fact, on probation or parole.

⁴⁴ It should be noted that vehicle searches conducted as a result of probation and parole status cannot be directly tied to the individual when multiple people are involved in a stop; therefore, it is difficult to determine whom the probation/parole search pertains to. Similarly, contraband seizure is not linked to the individual or the type of search (person or vehicle) that resulted in the seizure. Appendix A in the 12th Semi-Annual Report provides the results from additional analyses such as restricting to single-person stops, to gain more clarity on the outcomes of individuals stopped. See www.antelopevalleysettlementmonitoring.info/

2018 (62%).

- In the most recent reporting period among people who indicated they were on probation or parole when asked, Black and Latino people were more likely than White people to have had a person or vehicle search conducted as a condition of their probation and parole status: 358 Black and 369 Hispanic people had a probation or parole search conducted, compared with 157 White people.
- Over the past three years among people who indicated they were on probation or parole when asked AND who had a search conducted as a condition of their probation and parole status, the searches of Black and Hispanic people were consistently less likely to yield contraband than searches of White people.

Notable trends: The percentages of people being asked about their probation and parole status have considerably declined for all race groups in the past year. Despite the overall drop in the question being asked, disparities persist among who gets asked while there are little differences by race for people who answer “yes.”

TABLE A6						
PROBATION AND PAROLE STATUS						
OUTCOME	JULY – DECEMBER 2018	JANUARY – JUNE 2019	JULY – DECEMBER 2019	JANUARY – JUNE 2020	JULY – DECEMBER 2020	JANUARY – JUNE 2021
Percent of people stopped asked if they were on probation or parole						
% asked, all	39%	49%	53%	64%	44%	33%
% asked, Black	46%	55%	57%	69%	49%	39%
% asked, Latino	38%	49%	53%	63%	43%	31%
% asked, White	34%	44%	51%	59%	40%	29%
Percent of people stopped asked if they were on probation or parole AND answered “Yes”						
% answered “Yes,” all	18%	15%	13%	16%	20%	21%
% answered “Yes,” Black	19%	16%	14%	16%	20%	22%
% answered “Yes,” Latino	17%	14%	12%	15%	20%	19%
% answered “Yes,” White	20%	16%	14%	15%	20%	22%
Percent of people stopped asked if they were on probation or parole, answered “Yes,” AND searched as condition of probation/parole						
% searched, all	62%	64%	66%	69%	68%	74%
% searched, Black	61%	63%	64%	69%	66%	74%
% searched, Latino	66%	65%	69%	71%	70%	75%
% searched, White	55%	62%	65%	66%	68%	71%

TABLE A6						
PROBATION AND PAROLE STATUS						
OUTCOME	JULY – DECEMBER 2018	JANUARY – JUNE 2019	JULY – DECEMBER 2019	JANUARY – JUNE 2020	JULY – DECEMBER 2020	JANUARY – JUNE 2021
Percent of people stopped asked if they were on probation or parole, answered “Yes,” searched as condition of probation/parole, AND had contraband seized						
% contraband seized, all	15%	17%	15%	17%	24%	21%
% contraband seized, Black	11%	12%	11%	9%	18%	16%
% contraband seized, Latino	20%	19%	15%	21%	26%	24%
% contraband seized, White	13%	19%	20%	19%	30%	27%

7. Vehicle Impoundment

Although the differences are small, Latino people were most likely to have their car impounded after a stop, followed by Black and White people (Table A7).⁴⁵

- In the first half of 2021, the impoundment rates were 3.4% for Latino, 3.2% for Black, 2.8% for White, and 3.1% overall.
- These rates declined slightly for all race and ethnic groups.

TABLE A7						
VEHICLE IMPOUNDMENTS: SINGLE-PERSON STOPS RESULTING IN VEHICLE IMPOUNDMENT						
OUTCOME	JULY – DECEMBER 2018	JANUARY – JUNE 2019	JULY – DECEMBER 2019	JANUARY – JUNE 2020	JULY – DECEMBER 2020	JANUARY – JUNE 2021
% with impoundment, all	3.7%	3.0%	3.2%	4.3%	3.1%	3.2%
% with impoundment, Black	4.3%	3.7%	4.1%	5.3%	4.0%	3.2%
% with impoundment, Latino	3.9%	3.1%	3.2%	3.6%	3.1%	3.4%
% with impoundment, White	2.5%	2.0%	2.3%	4.3%	2.2%	2.8%

⁴⁵ Vehicle impoundment is a stop-based measure rather than specific to the person stopped. In the event of multiple people being stopped, the impoundment code is the same for everyone stopped. The following results are from vehicle stops only (excluding pedestrian and bicycle stops) and limited to single-person stops for a more direct racial comparison of outcomes.

8. Citations and Arrests

Black people were the most likely to be arrested and the least likely to be cited after a stop (Table A8).⁴⁶

- In the first half of 2021, the arrest rates were 22.1% for Black people (978 out of 4,428 stops), 19.5% for Latino people (1,351 out of 6,907 stops), and 19.1% for White people (546 out of 2,854 stops).
- In the first half of 2021, the citation rates were 55.3% for White people (1,577 out of 2,854 stops), 53.6% for Latino people (3,699 out of 6,907 stops), and 41.6% for Black people (1,840 out of 4,428 stops).

Across the two years of data, Black people are consistently most likely to be arrested, and White people are consistently most likely to be cited.

TABLE A8						
CITATIONS AND ARRESTS						
OUTCOME	JULY – DECEMBER 2018	JANUARY – JUNE 2019	JULY – DECEMBER 2019	JANUARY – JUNE 2020	JULY – DECEMBER 2020	JANUARY – JUNE 2021
Arrests						
% stops leading to arrest, all	20%	21%	24%	27%	24%	20%
% stops leading to arrest, Black	26%	26%	30%	30%	28%	22%
% stops leading to arrest, Latino	19%	21%	22%	25%	24%	20%
% stops leading to arrest, White	16%	18%	21%	26%	22%	19%
Citations						
% stops leading to citation, all	59%	55%	50%	40%	54%	51%
% stops leading to citation, Black	51%	48%	47%	33%	45%	42%
% stops leading to citation, Latino	63%	57%	57%	43%	57%	54%
% stops leading to citation, White	62%	59%	57%	44%	59%	55%

9. Limitations of the Analysis in the Stops Data

It is important to note that some outcomes are specific to the reasoning and circumstances of the stop, while others are specific to individuals involved in the stop. Therefore, the percentages presented here

⁴⁶ The citation and arrest data are limited to single-person stops for a more direct racial comparison of outcomes.

may have different denominators. Additionally, where multiple people are involved in a stop, making racial comparisons of stop-based outcomes becomes nuanced because it is difficult to determine specific outcomes to specific persons in the stop. Restrictions in the CAD data-entry process result in several limitations in analyzing the data.

Other key limitations include the following: (1) Only two people can be entered in any one stop record. If more people are stopped, deputies must create a new incident and link the incident using a reference tag ID; errors and inconsistencies in the use of reference tags can result in missing information from a stop; (2) Some outcomes that are specific to individuals are summarized across the stop when multiple people are listed in the stop, preventing direct comparisons of outcomes across race and ethnicity groups; (3) Assisting unit narratives and other data fields are often missing information, likely because the information is already recorded in the original stop report; and (4) Contraband seizure is not tied to search method.

APPENDIX B: 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, auditing, and evaluation work in policing and corrections.

Additionally, most of the MT members have served in law enforcement, 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 C: 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.⁴⁷ 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).

⁴⁷ 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 with one or more other provisions.