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March 19, 2026

TO: Each Supervisor

FROM: Oscar Valdez
Auditor-Controller

Robert G. Campbell
Assistant Auditor-Controller / Chief Audit Executive

SUBJECT: **SHERIFF’S DEPARTMENT – CARRY CONCEALED WEAPON
PROCESS REVIEW (July 12, 2022, Board Agenda Item 22,
Report #K23BF) - FIRST FOLLOW-UP REVIEW**

We completed a follow-up review of the Sheriff’s Department (Sheriff or Department) Carry Concealed Weapon (CCW) Process Review dated December 20, 2022 (Report #K23BF). As summarized in Table 1, the Department implemented five recommendations, partially implemented four recommendations, and did not implement three recommendations to enhance their CCW licensing processes. The Department should fully implement the seven outstanding recommendations to strengthen controls and monitoring over CCW licensing processes.

Table 1 - Results of First Follow-up Review

PRIORITY RANKINGS	TOTAL RECOS	RECOMMENDATION IMPLEMENTATION STATUS		
		FULLY IMPLEMENTED	PARTIALLY IMPLEMENTED	NOT IMPLEMENTED
PRIORITY 1	4	0	3	1
PRIORITY 2	7	4	1	2
PRIORITY 3	1	1	0	0
TOTAL	12	5	4	3
		7		

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For details of our review and the Department's corrective actions, see Attachment I. We will follow up and report back on the four outstanding Priority 1 and three outstanding Priority 2 recommendations. In addition, the Department provided a response to our findings, indicating they have made significant progress in implementing our recommendations (see Attachment II) since we conducted our follow-up. We will examine and report on that progress during our next follow-up review.

We thank Sheriff management and staff for their cooperation and assistance during our review. If you have any questions please call us, or your staff may contact Jeffrey Ho at jeho@auditor.lacounty.gov.

OV:CY:RGC:JH:YK:cg

Attachments

c: Joseph M. Nicchitta, Acting Chief Executive Officer
Edward Yen, Executive Officer, Board of Supervisors
Robert G. Luna, Sheriff
Audit Committee
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Robert G. Campbell
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AUDIT DIVISION

Report #K24BY

SHERIFF'S DEPARTMENT
CARRY CONCEALED WEAPON PROCESS REVIEW (REPORT #K23BF)
FIRST FOLLOW-UP REVIEW

RECOMMENDATION	A-C COMMENTS
<p>1 Carry Concealed Weapon License Issuance (Priority 1) - Sheriff's Department (Sheriff or Department) management strengthen the Carry Concealed Weapon (CCW) license issuance processes by:</p> <ul style="list-style-type: none"> a) Establishing controls, such as approvals and/or reconciliations, to ensure staff only issue and activate licenses for approved applicants. b) Separating incompatible duties or establishing additional compensating controls for staff who issue and activate licenses. <p>Original Issue/Impact: The Sheriff had processes for staff to review CCW license applications for compliance with various requirements (e.g., background checks), record their progress in the CCW Tracking System (Tracking System), and compile documentation in a hardcopy application file. After a CCW license application is approved, staff enter the licensee details in the CCW License Printing System, print/issue the physical license, and update the license status in the Tracking System.</p> <p>However, staff had the ability to issue and activate licenses without any review or approval. While this capability was limited to four individuals and the Sheriff indicated they were not aware of any instances where staff printed and issued licenses without an approved application, they did not have any controls to ensure that staff only printed and issued licenses for approved applicants. We also noted that the same individuals who physically print and issue CCW licenses had incompatible duties that should be separated. Specifically, these individuals also reviewed applications for compliance with CCW requirements, added supporting documents to hardcopy files, and updated license information in the Tracking System.</p>	<p>Recommendation Status: Not Implemented</p> <ul style="list-style-type: none"> a) We could not confirm Sheriff management implemented controls to ensure staff only issue and activate licenses for approved applicants. The Sheriff indicated they plan to establish a process to reconcile a listing of issued licenses from the CCW License Printing System with reports of approved applications generated by their new online application system (Permitium) to identify licenses issued without proper approval. The Sheriff should also ensure this process compares the licenses issued for paper applications received before Permitium was implemented, which includes a backlog of applications, as noted below in Recommendation No. 3. In addition, the Sheriff should investigate and resolve any discrepancies noted in their reconciliations. b) We could not confirm Sheriff management separated incompatible duties or established additional compensating controls for staff who issue and activate licenses. While the Department indicated that staff who issue and activate licenses do not currently review applications for compliance with eligibility requirements, we noted they still have the ability to perform this review function and there is no periodic check/monitoring to ensure staff do not perform this review. <p>We also noted these individuals continue to perform incompatible duties, such as updating license information in the Tracking System and Permitium and reviewing hardcopy files after the applications have been approved to ensure all documentation is in order, which can lead to the issuance of unauthorized licenses. The Department indicated they are unable to further separate these duties due to insufficient staffing, but will evaluate establishing compensating controls.</p> <p>Subsequent to our review, the Sheriff indicated they implemented this recommendation, and therefore, did</p>

Priority Ranking: Recommendations are ranked from Priority 1 to 3 based on the potential seriousness and likelihood of negative impact on the Agency's operations if corrective action is not taken.

RECOMMENDATION		A-C COMMENTS
	These weaknesses increase the risk staff could issue CCW licenses without approved applications and/or to ineligible individuals and such issuances go undetected.	not provide a planned implementation date. We will assess the Department's processes and the status of this recommendation during our second follow-up review.
2	<p>Good Moral Character Assessments (Priority 1) - Sheriff management improve their good moral character evaluation processes and controls by:</p> <p>a) Establishing a minimum definition of good moral character, such as uniform criteria for denying or revoking a CCW license and guidelines describing the specific steps in the assessment, to ensure assessments are objective and consistent.</p> <p>b) Establishing and codifying a formal process for staff to compile all information related to a CCW applicant, and to document their conclusion and justification for whether a CCW applicant is of good moral character.</p> <p>Original Issue/Impact: The Department had processes for evaluating CCW applicants' compliance with the good moral character requirement, in accordance with Penal Code (PC) 26150. This included a checklist for staff to perform steps, such as background checks (e.g., reviewing applicant information in the Sheriff's Justice Data Interface System and Custody Information Portal, and reviewing Live Scan results and interview notes in a hardcopy file for each applicant). However, we noted opportunities for the Sheriff to strengthen processes and controls to ensure that applicants' moral character is objectively and consistently evaluated. Specifically:</p> <ul style="list-style-type: none"> The Sheriff did not have a minimum objective definition of "good moral character," such as uniform criteria or guidelines to ensure assessments are performed as consistently as possible. The Sheriff did not have a formal, documented process requiring CCW licensing staff to compile all information they gathered, or to document their conclusion and justification for whether a CCW applicant is of good moral character. 	<p>Recommendation Status: Partially Implemented</p> <p>a) We confirmed that Sheriff management is in the process of establishing uniform criteria for evaluating CCW applicants' good moral character by reviewing their draft procedures. Subsequent to our review, the Department indicated that they have distributed interim guidelines to staff for their use in reviewing CCW applications while finalizing their procedures. We will confirm the Department implemented the procedures during our second follow-up review.</p> <p>b) We confirmed Sheriff management established a process for staff to compile all information related to a CCW applicant, and to document their conclusions for whether an applicant is of good moral character, by reviewing their updated checklist. The checklist includes specific steps that staff must follow when reviewing systems/records during the background checks. Staff are also required to document their conclusions to support whether a CCW applicant meets eligibility requirements, including any issues noted that may impact good moral character, such as false information the applicant may have provided or undisclosed criminal charges. As noted above, the Sheriff indicated they have distributed interim guidelines to staff for evaluating the applicants' good moral character after our review. We will assess the Department's adherence to these guidelines during our second follow-up review.</p> <p>Subsequent to our original review, there were updates to PC 26150 that removed the good moral character requirement and now includes disqualifying criteria that would prohibit an applicant from receiving or renewing their CCW license, for applications received on or after January 1, 2024. During our follow-up review, the Department indicated they were still processing applications received before this date due to their backlog (see Recommendation No. 3 for application backlog).</p> <p>Subsequent to our follow-up review, the Sheriff indicated they have fully processed all applications received prior to the 2024 PC updates and that this recommendation is no longer applicable. We will</p>

RECOMMENDATION		A-C COMMENTS
	These weaknesses increase the risk that CCW applicants are evaluated subjectively and inconsistently, and that licensure decisions are inadequately supported.	assess the status of this recommendation during our second follow-up review.
3	<p>License Application Processing - Backlog (Priority 1) - Sheriff management:</p> <p>a) Finalize and implement their plans to resolve the CCW license application processing backlog, as noted in the issue.</p> <p>b) Assess proper staffing positions/levels, such as final Undersheriff approval, to help resolve the large number of applications in process.</p> <p>Original Issue/Impact: The Department was not completing their review of CCW applications and notifying applicants of approval or denial within the PC 26205 required timeframes. During our original review, the Department had approximately 10,300 applications in progress and a processing time of approximately one year. The Sheriff was aware of their backlog and indicated it was due to several factors, including an increase in applications following the United States Supreme Court’s New York Rifle & Pistol Association vs. Bruen decision, and the lack of dedicated staff to process the volume of applications received (i.e., CCW processing staff are not dedicated solely to CCW processing duties). The Department indicated that they were in the process of dedicating resources to reduce the backlog, and were performing a staffing analysis to determine the number of dedicated CCW personnel needed moving forward, including preparing budget requests for the positions and equipment to process applications more timely. However, the Sheriff still needed to finalize these plans.</p> <p>We also noted that the Department required final approval by the Undersheriff for all applications, and would evaluate appropriate alternatives to help resolve the backlog.</p> <p>Delays in issuing licenses for qualified applicants increase the risk of legal liability and loss of public trust in the CCW license program. In addition, processing delays increase the risk that applicant information (e.g., address, employment, firearm registration) will no longer be current when applications are reviewed, which can lead to increased work and further processing delays.</p>	<p>Recommendation Status: Partially Implemented</p> <p>a) Sheriff management did not finalize and implement their plans to resolve the CCW license application processing backlog, as recommended. However, we noted they submitted their anticipated overtime for existing CCW Unit staff to help process applications. We also noted the CCW Unit completed a staffing analysis to determine the number of staff, including dedicated staff needed to help resolve the backlog, which they indicated has decreased to approximately 3,200 applications in progress, as of September 30, 2025 (we did not verify this number). We are unable to determine if there has been a significant change in application processing time due to tracking limitations during our original review (see Recommendation No. 4). The CCW Unit also indicated they continue to work with their management to approve the plan and request related funding.</p> <p>b) We confirmed Sheriff management assessed proper staffing positions/levels, as recommended, to help resolve the large number of applications in process by reviewing their staffing analysis, as noted above in Recommendation No. 3a, and internal memo to staff. The memo indicates the Undersheriff delegated final approval of CCW applications to a Lieutenant in their office.</p> <p>Subsequent to our review, the Sheriff indicated they implemented this recommendation and eliminated their backlog, and therefore, did not provide a planned implementation date. We will assess the status of this recommendation during our second follow-up review.</p>

Priority Ranking: Recommendations are ranked from Priority 1 to 3 based on the potential seriousness and likelihood of negative impact on the Agency’s operations if corrective action is not taken.

RECOMMENDATION	A-C COMMENTS
<p>4 License Application Processing Timeliness (Priority 1) - Sheriff management strengthen processes and controls to ensure applications for CCW licenses, including amendments and renewals, are processed timely and in the order received by:</p> <p>a) Establishing a process to track all applications upon receipt.</p> <p>b) Establishing processes to properly track key application information, including processing dates and review results, and perform periodic reviews of application processing data/reports.</p> <p>c) Implementing controls to ensure CCW license fees are endorsed and deposited in accordance with County Fiscal Manual (CFM) requirements.</p> <p>d) Restricting access in the CCW Tracking System so users receive only the access or information necessary for their job duties.</p> <p>Original Issue/Impact: The Department did not have a process to track (e.g., log/record) applications upon receipt to ensure they were all accounted for and processed within the PC 26205 required timeframes. In addition, the Department did not have processes to track key application data (e.g., review results and dates staff completed processing milestones), or perform periodic reviews of the limited data they did track, to ensure staff processed applications timely and in the order received.</p> <p>During our walkthrough and observations of the application review process, we also noted:</p> <ul style="list-style-type: none"> The Sheriff did not have controls to ensure CCW fee payments were endorsed and deposited upon receipt, as required by CFM Section 1.3.2. The Sheriff did not restrict access to the Tracking System to ensure users only received access or information necessary to perform their job duties, as required by CFM Section 8.7.4. <p>These weaknesses increase the risk that CCW applications and fee payments for unprocessed applications will be lost, delayed, and/or processed out-of-order and for issues to go undetected by management. This can also cause a loss of public</p>	<p>Recommendation Status: Partially Implemented</p> <p>a) We confirmed Sheriff management established a process to track all applications upon receipt by reviewing their application instructions. The instructions require all applications to be submitted through Permitium, as paper applications are no longer accepted. We also confirmed that Permitium tracks the date applications are received by reviewing system-generated reports.</p> <p>b) We confirmed Sheriff management established processes to track key application data, by reviewing reports from their Tracking System and Permitium. In addition, we confirmed the Department established a process for CCW Unit staff to periodically review these reports, which show the application's progress for initial and renewal licenses, to ensure they are processed timely and issues noted are resolved, by reviewing their documented review results, including e-mails requesting missing documents from applicants.</p> <p>c) We confirmed Sheriff management implemented controls to ensure CCW license fees are deposited in accordance with CFM requirements, by performing a walkthrough of their new payment and deposit process. Specifically, applicants must pay application fees online and the Sheriff requires Fiscal Operations staff to reconcile the monthly payment deposit records with Permitium collection reports to ensure the funds received are correct. We also confirmed staff adhered to this process by reviewing their documented reconciliations, including collection reports and deposit records.</p> <p>d) While we could not confirm the Sheriff restricted CCW Tracking System access to users' job duties, we noted the Department made changes to the System, which will help them restrict access. Specifically, we noted the Department modified user access to the Tracking System by reviewing their system user access listings, which show that all users have one of three different access levels. However, we could not confirm if the Department restricted access levels based on assigned job duties or that they reviewed access levels for all users to ensure they are appropriate.</p> <p>Subsequent to our review, the Sheriff indicated they implemented this recommendation, and therefore, did not provide a planned implementation date. We will assess the Department's processes and the status of this recommendation during our second follow-up review.</p>

RECOMMENDATION		A-C COMMENTS
	trust in the fairness of the CCW license issuance process.	
5	<p>Mental Health Assessments (Priority 2) - Sheriff management evaluate establishing processes and controls to guide staff in consistently and objectively assessing applicant mental health, including specific situations when it would be appropriate to refer an applicant for psychological testing during the CCW license issuance/renewal process and/or to deny a CCW license based on mental health.</p> <p>Original Issue/Impact: PC 26190 allows, but does not require, the Sheriff to conduct psychological testing of applicants before issuing a CCW license. We noted the Sheriff did not have a process to assess mental health concerns that arise during the application review process, including objective criteria for referring an applicant for psychological evaluation or denying CCW applications based on mental health concerns. For example, this could include outlining the required steps staff need to perform, such as information they need to obtain, criteria for referring applicants for psychological testing, and criteria for denying a CCW license application for mental health issues.</p> <p>This weakness increases the risk that CCW applicants are subjected to inconsistent criteria when being evaluated for mental health issues, that mental health testing is applied in a subjective or inconsistent manner, and that CCW denials based on potential mental health concerns are not supported by objective evidence or adequately documented.</p>	<p>Recommendation Status: Implemented</p> <p>We confirmed Sheriff management evaluated establishing processes and controls, as recommended, to assess CCW applicants' mental health by reviewing their assessment results and implementation plans. The Department requires staff to obtain information during the applicants' background checks and in-person interviews related to their behavior and mental health. For example, this includes assessing overall behavior based on responses to specific behavioral and mental health questions, and requiring staff to discuss results/concerns (e.g., inconsistent responses, inappropriate behavior, documented mental health illnesses) with the CCW supervisor to determine whether they need to refer the applicant for psychological evaluation. The Sheriff also requires staff to maintain documentation to support the referral. We confirmed staff adhered to this process by reviewing examples of referral documentation, such as history of mental health issues and concerning communications from the applicant that may indicate potential risks (e.g., inappropriate and/or threatening messages).</p> <p>We also confirmed that the Sheriff modified their contracts with existing providers to allow them to provide psychological evaluations for CCW applicants by reviewing the Department's approved contract amendment.</p>
6	<p>Monitoring Licensees (Priority 2) - Sheriff management strengthen licensee monitoring processes and controls by:</p> <p>a) Establishing controls to track all reported licensee incidents and Department of Justice (DOJ) violations to ensure accountability from reporting to resolution.</p> <p>b) Developing documented, objective criteria for when to suspend/revoke licenses, and establishing processes for reporting revocations to the DOJ and licensee, and for tracking and ensuring the timely return of physical licenses.</p>	<p>Recommendation Status: Partially Implemented</p> <p>a) We confirmed Sheriff management established controls to track all reported licensee incidents and DOJ violations to ensure accountability from reporting to resolution, by performing a walkthrough of their incident tracking process. The process requires staff to enter all reported licensee incidents and DOJ violations in the tracking log and update their investigation results and resolution. We also confirmed staff adhered to this process by reviewing the tracking log, which includes the status of investigation and resolution (e.g., CCW</p>

Priority Ranking: Recommendations are ranked from Priority 1 to 3 based on the potential seriousness and likelihood of negative impact on the Agency's operations if corrective action is not taken.

RECOMMENDATION	A-C COMMENTS
<p>Original Issue/Impact: The Department had processes to address licensee violations reported by the DOJ, as required by PC 26195, and licensee self-reported incidents, as required by the Department’s CCW Terms of Use Policy. However, the Department did not have controls to centrally track all reported incidents and DOJ violations to ensure they were accounted for and resolved. The Sheriff also did not have documented, objective criteria for when to suspend/revoke licenses, and processes for reporting revocations/suspensions to the DOJ and licensee, and collecting related physical licenses timely.</p> <p>These weaknesses increase the risk that incidents which may impact a licensee’s suitability and/or legal ability to retain a CCW license are not consistently investigated, that CCW license revocation or suspension decisions are made based on inconsistent and/or subjective criteria, and that the Department will fail to comply with statutory reporting obligations when suspending or revoking licenses. Also, not collecting physical licenses timely allows prohibited individuals to retain their CCW licenses despite no longer having the legal authority to carry a concealed weapon. These weaknesses could expose the County to legal liability.</p>	<p>license suspension, revocation, and/or reissuance).</p> <p>b) We confirmed the Department established processes for reporting suspensions and revocations to the licensee and DOJ, and for tracking the return of physical licenses, by performing a walkthrough of their reporting and tracking process. The process requires staff to notify licensees of their license suspensions and revocations, report revocations to the DOJ, and annotate in a tracking log when licensees returned their physical licenses and when staff completed the DOJ revocation reporting forms. We also confirmed staff adhered to this process by reviewing suspension/revocation notifications to licensees, completed DOJ revocation forms, and the completed tracking log.</p> <p>However, we could not confirm the Department developed documented, objective criteria for when to suspend or revoke CCW licenses. While the Sheriff indicated they rely on PC requirements and the Department’s CCW Terms of Use Agreement when evaluating reported incidents involving CCW licensees, they also described processes/controls for reported incidents that are not severe enough to result in automatic revocation, but may require further investigation. Specifically, the Department has not established guidelines for staff to evaluate if these incidents need to be investigated, and determine if license suspension/revocation is appropriate. Such guidelines would help to ensure staff objectively and consistently evaluate reported incidents involving CCW licensees.</p> <p>The Department indicated they plan to fully implement this recommendation by October 31, 2026.</p>
<p>7 License Processing – Compliance with Requirements (Priority 2) - Sheriff management improve processes and controls to ensure applications for CCW licenses, including amendments and renewals, are properly reviewed for compliance with CCW requirements by:</p> <p>a) Reminding staff and establishing controls, such as an item on their application review checklist, to reject applications from residents of incorporated cities unless the Sheriff has an existing agreement with the jurisdiction to process such applications, or if the applicant</p>	<p>Recommendation Status: Implemented</p> <p>a) We confirmed that Sheriff management reminded staff and established processes and controls to reject CCW applications from residents of incorporated cities unless the applications are within the Sheriff’s jurisdiction, or if the applicant has been rejected by their city, by reviewing their updated license application instructions that were distributed to CCW staff. The instructions require applicants to utilize an address verification website to confirm that their address is within Sheriff’s jurisdiction before submitting their application. The process also requires CCW staff to verify</p>

RECOMMENDATION	A-C COMMENTS
<p>has been rejected for a CCW license by their city within 60 days of applying with the Sheriff.</p> <p>b) Establishing controls, such as criteria for staff to follow when reviewing applications from residents of incorporated cities and the reasons they were previously denied, to ensure such applications are objectively and consistently reviewed.</p> <p>c) Establishing controls to ensure that training providers document their inspection of applicants' firearms for safety and compliance with State and federal firearms law.</p> <p>Original Issue/Impact: The Sheriff had processes for staff to review CCW applications for compliance with various requirements and submit them to Sheriff supervisors and managers for approval. This included verifying applicants reside or work within the County, registered their firearms with the State, and completed firearm training requirements. However, we noted control weaknesses that prevented the Sheriff from ensuring they review CCW license applications, amendments, and renewals for compliance with certain requirements. Specifically:</p> <ul style="list-style-type: none"> We noted that Sheriff policy requires that staff reject applications from residents of incorporated cities unless the Sheriff has an agreement with the jurisdiction to process such applications, or the applicant was rejected by their city within the past 60 days of applying with the Sheriff. During our interviews and walkthrough, staff indicated they were aware of this requirement, but they were not enforcing it, and the Sheriff had been processing all applications received from incorporated city residents within the County. <p>In addition, Sheriff policy required applicants who reside in an incorporated city and were denied a CCW license by their local police department to attach a copy of their denial letter to their County CCW license application. However, the Sheriff had not established formal criteria for staff to follow when evaluating the incorporated city's reason(s) for denial and determining whether to proceed with the normal application review process.</p>	<p>applicants' addresses are within jurisdiction and reject applications if they are not, and/or if the applicant did not attach a denial letter from their local police department with their application. We also confirmed staff adhered to this process by reviewing withdrawn applications and rejection notifications to applicants advising them to apply with their local police department.</p> <p>b) We confirmed Sheriff management established controls for reviewing applications from residents of incorporated cities and the reasons they were previously denied to ensure applications are objectively and consistently evaluated, by performing a walkthrough of their updated process. The process requires CCW staff to review these applications by following their standard application review process, regardless of the reason for denial by the applicants' local police department. The Sheriff did not have examples of these applications since implementing this process, but we evaluated and confirmed this process during our original review.</p> <p>c) We confirmed Sheriff management established controls to ensure that training providers document their inspection of applicants' firearms for safety and compliance with State and federal firearms law, by reviewing their updated firearms training form. The updated form requires training providers to document or attest that they inspected all firearms that will be included on the applicants' CCW license for compliance with State and federal requirements. We also confirmed training providers adhered to this process by reviewing completed forms.</p>

RECOMMENDATION	A-C COMMENTS
<ul style="list-style-type: none"> The Sheriff required firearms training providers to inspect all firearms listed on the CCW applications to ensure they are safe, operable, and in compliance with State and federal laws. However, the Sheriff did not obtain any documentation from training providers to ensure the inspections occurred or the outcome. <p>These weaknesses increase the risk that training providers do not inspect or adequately document their inspection of CCW applicant firearms for safety and compliance with legal requirements. Additionally, processing CCW license applications for incorporated city residents from jurisdictions that do not contract with Sheriff for such services may create additional work for CCW unit staff.</p>	
<p>8 CCW License Reporting (Priority 2) - Sheriff management strengthen processes and controls to ensure CCW license information is reported consistently and timely to appropriate State agencies by:</p> <ul style="list-style-type: none"> a) Establishing a process to annually report license information for judges and peace officers to the State Attorney General. b) Establishing controls, such as timeframe and documentation requirements, to report license decisions to the DOJ. <p>Original Issue/Impact: The Sheriff did not have a process to annually report the number of licenses issued to judges and peace officers to the State Attorney General, as required by PC 26225(c)(1). The Sheriff also did not have controls to ensure they report license and amendment decisions to the DOJ, pursuant to PC 26225(b). While they had a standard form for DOJ reporting and indicated they make timely notifications, they did not have controls to support they sent these forms consistently and timely. Controls could include outlining staff responsibilities, reporting timeframes, and documentation requirements (e.g., documented mailing dates for transmitted forms).</p> <p>These weaknesses prevent the Sheriff from ensuring it meets its mandated reporting requirements under PC 26225.</p>	<p>Recommendation Status: Implemented</p> <ul style="list-style-type: none"> a) We confirmed Sheriff management established a process to annually report license information for judges and peace officers to the State Attorney General by performing a walkthrough of their annual reporting process. The process requires CCW staff to follow the Attorney General's instructions, which they distribute annually, for preparing and filing the required annual report. We also confirmed CCW staff adhered to their process and Attorney General's instructions by reviewing the Sheriff's e-mail to the Attorney General that included their latest report. b) We confirmed Sheriff management established controls, such as timeframe and documentation requirements to report license decisions to the DOJ, by performing a walkthrough of their DOJ notification process. The new process requires staff to report license decisions to the DOJ on a weekly basis. We also confirmed staff adhered to the process by reviewing recent examples of notifications to the DOJ, including e-mails and a certified mail receipt to support when the required information was reported to the DOJ.

	RECOMMENDATION	A-C COMMENTS
9	<p>CCW File Security (Priority 2) - Sheriff management improve processes for physically securing unattended CCW applicant files.</p> <p>Original Issue/Impact: The Sheriff did not have adequate processes and controls for physically securing unattended CCW applicant files to ensure non-public applicant information is protected from unauthorized access, as required by Board of Supervisors Policy 3.041. During our walkthrough of the CCW Unit, we observed approximately 200 CCW license application files left unattended on staff desks. These files include personally identifiable information (PII) such as birthdates, social security numbers, driver licenses, and criminal background check reports.</p> <p>This weakness increases the risk of unauthorized disclosure of CCW applicants' PII.</p>	<p>Recommendation Status: Implemented</p> <p>We confirmed Sheriff management improved processes to physically secure unattended CCW applicant files, by reviewing their new file security policy, which requires staff to secure unattended files and ensure all files are stored in locked file cabinets at the end of work shifts. We also confirmed Sheriff management communicated this policy to staff by reviewing e-mail correspondence. In addition, we confirmed the Department acquired locking file cabinets by reviewing purchase receipts.</p>
10	<p>Management Monitoring of Controls (Priority 2) - Sheriff management develop ongoing CCW self-monitoring processes that include:</p> <ol style="list-style-type: none"> Examination of process and control activities, such as review of an adequate number of transactions on a regular basis to ensure adherence to Department policy and PC requirements. Documenting the monitoring activity and retaining evidence so it can be subsequently validated. Elevating material exceptions to management on a timely basis to ensure awareness of relative control risk, and that appropriate corrective actions are implemented. <p>Original Issue/Impact: The Sheriff did not have ongoing self-monitoring processes to regularly evaluate and document that the following CCW processes and controls were working as intended, as required by CFM Section 1.0.2:</p> <ul style="list-style-type: none"> License printing/issuance and activation controls. Separation of duties controls. Application, renewal, and amendment tracking and processing timeliness. Application, renewal, and amendment review and approval processes, including good moral character assessments, mental health 	<p>Recommendation Status: Not Implemented</p> <p>We could not confirm that Sheriff management developed CCW self-monitoring processes. While the Department indicated they have managers perform operational processes such as reviewing CCW applications before approving licenses, self-monitoring is not accomplished by having managers perform operational processes, but by having managers who are not directly involved in the process conduct independent monitoring of them. We worked with Sheriff management to clarify the issue and recommendation so they can take appropriate corrective action.</p> <p>Sheriff management also indicated they will develop effective self-monitoring processes and request assistance from their internal audit group to conduct monitoring of the CCW licensing areas noted in our original issue.</p> <p>The Department indicated they plan to fully implement this recommendation by October 31, 2026.</p>

RECOMMENDATION	A-C COMMENTS
<p>assessments, Live Scan requirements, and incorporated city resident application processing.</p> <ul style="list-style-type: none"> • Firearm training certifications and training provider pre-certifications. • Firearm inspections for safety and compliance with State and federal law. • Licensee monitoring, violation/incident tracking and follow-up, and license suspensions/ revocations. • License and amendment reporting to applicable State agencies. • Physical security of CCW license applicant files. <p>These weaknesses prevent management from having reasonable assurance that the Department is achieving important departmental and CCW license processing objectives. Increases the risk of not promptly identifying and correcting any process/control weaknesses or instances of noncompliance with Department CCW policies and/or PC requirements.</p>	
<p>11 Standards and Procedures (Priority 2) - Sheriff management develop written standards and procedures, as noted in the issue, to guide supervisors and staff in performing CCW license processing duties.</p> <p>Original Issue/Impact: The Sheriff did not have written standards and procedures to adequately guide supervisors and staff in the performance of their CCW processing duties for the following areas, as required by CFM Section 8.3.0:</p> <ul style="list-style-type: none"> • License printing/issuance and activation controls. • Separation of duties controls. • Application, renewal, and amendment tracking and processing timeliness. • Good moral character assessments. • Mental health assessments. • Firearm training provider certification and monitoring. • Firearm inspections for safety and compliance with State and federal law. • Licensee monitoring, incident tracking and follow-up, and license suspensions/ revocations. 	<p>Recommendation Status: Not Implemented</p> <p>We could not confirm Sheriff management developed written standards and procedures to guide supervisors and staff in performing CCW license processing duties. Subsequent to our review, the Department indicated they have distributed interim guidelines to CCW Unit staff, and will continue to finalize written standards and procedures for areas noted in our original issue. We will assess the Department’s procedures and the status of this recommendation during our second follow-up review.</p> <p>The Department indicated they plan to fully implement this recommendation by October 31, 2026.</p>

RECOMMENDATION	A-C COMMENTS
<ul style="list-style-type: none"> • License and amendment reporting to applicable State agencies. • Physical security of CCW license applicant files. • Self-monitoring processes noted in Issue No. 10. <p>Also, the Sheriff needed to update its existing written standards and procedures for processing applications for residents of incorporated cities to include processes for assessing letters of denial for applications previously denied by an incorporated city.</p> <p>Standards and Procedures should provide detailed guidance to staff and supervisors in the performance of their day-to-day duties and describe how processes are performed.</p> <p>This weakness significantly increases the risk staff will perform tasks, such as CCW application reviews and license issuance, incorrectly or inconsistently, which could result in inconsistent and/or unauthorized issuance of CCW licenses.</p>	
<p>12 CCW Firearms Training Providers (Priority 3) - Sheriff management improve their CCW firearm training processes to include:</p> <ul style="list-style-type: none"> a) Establishing a process to periodically monitor firearms training providers and/or obtain periodic attestations to ensure they continue to comply with the Department’s training standards. b) Developing a plan to determine and support whether the Sheriff has a need to certify new firearm training providers as noted in the issue. <p>Original Issue/Impact: The Sheriff requires CCW applicants to obtain firearms training which must be administered by Sheriff-certified providers. Sheriff policy also requires providers to submit training program changes (e.g., instructors, curriculum) prior to implementation. However, we noted the Sheriff did not have controls, such as periodic reviews and/or provider attestations, to ensure providers comply with training program requirements and submit training program changes prior to implementation.</p> <p>During our interviews and walkthroughs, we also noted the Sheriff was not accepting/reviewing new</p>	<p>Recommendation Status: Implemented</p> <ul style="list-style-type: none"> a) We confirmed Sheriff management established a process to periodically monitor firearms training providers by reviewing their monitoring questionnaire. The questionnaire requires Sheriff staff to periodically (e.g., monthly or as-needed) contact CCW applicants who recently completed firearms training to inquire about the course, materials covered, overall quality, etc., and follow up with training providers on potential noncompliance issues. If the Department determines that the training provider did not comply with established standards, the Department removes the provider’s certified status and notifies the provider of their decision. We also confirmed staff adhered to this process by reviewing their documented review results and notification to a training provider indicating they failed to comply with training program requirements and are no longer a certified provider. b) We confirmed Sheriff management developed a plan for certifying new firearm training providers by reviewing their evaluation results. The Department’s evaluation indicates they will need up to 50 certified training providers to meet current needs and coverage. The Department also

RECOMMENDATION	A-C COMMENTS
<p>applications for training providers and had not evaluated the need to certify new training providers. The Sheriff indicated that staffing issues prevented them from certifying new training providers. We noted that the Sheriff had not developed a plan or evaluated provider coverage in the County, as well as any funding or staffing needs to support certifying additional providers.</p> <p>These weaknesses increase the risk that the Sheriff's certified training providers (34 at the time of our original review) may fall out of compliance with Department and PC training requirements without detection, resulting in inadequate training for some CCW licensees. By not accepting applications from or certifying new training providers, the Sheriff may be preventing other local businesses from participating in the market for firearms training.</p>	<p>indicated they are continuing to certify more training providers to meet this target, and will re-evaluate the target as necessary, based on feedback from CCW applicants. We also noted the Sheriff certified additional providers since the time of our original review, by reviewing the Department's updated list of certified providers.</p>

We conducted our review in conformance with the International Standards for the Professional Practice of Internal Auditing. For more information on our auditing process, including recommendation priority rankings, the follow-up process, and management's responsibility for internal controls, visit auditor.lacounty.gov/audit-process-information.



OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ROBERT G. LUNA, SHERIFF



March 5, 2026

Oscar Valdez, Auditor-Controller
County of Los Angeles
500 West Temple Street, Room 525
Los Angeles, California 90012

Dear Mr. Valdez:

CARRY CONCEALED WEAPON PROCESS

Below is the Los Angeles County Sheriff's Department's Carry Concealed Weapon Unit response to the Carry Concealed Weapon Process First Follow-up Review.

The Department has made significant progress implementing the recommendations since the Auditor-Controller's last review and looks forward to sharing these updates during the next follow-up review.

Should you have any questions regarding the Department's response, please contact Lieutenant Jorge Marchena, Office of the Undersheriff at (213) 229-3079.

Sincerely,

ROBERT LUNA, SHERIFF

APRIL L. TARDY
UNDERSHERIFF

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

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