

Report Card: Status of COC's 27 Recommendations to eliminate deputy gangs and deputy cliques (Updated: January 5, 2024)

This Report Card sets forth the COC's 27 Recommendations found in the Report of the COC Special Counsel of February 2023, and unanimously adopted by the Commission as its Recommendations on March 3, 2023. The Report Card, below, indicates whether the LASD has *Fully Implemented, Partially Implemented or Not Implemented* a particular Recommendation . In the chart below Commission's Recommendations are cross-referenced to the COC Special Counsel Report's recommendations and contains a statement regarding their status as of October 23, 2024¹ with brief comments, where appropriate. We also indicate in the last column those Recommendations that the Sheriff's Department has rejected.

COC Recommendation	Sp Counsel Rpt. (Cross-Reference)	Status	Comments	Policy Recs Rejected by Sheriff ²
1. The Sheriff must clearly state his vision of deputy gangs/cliques.	Rec. A-1	Partially Implemented	The Sheriff's has articulated a vision in communications and leadership sessions, but to date has failed to include a clear vision of ridding the LASD of deputy cliques.	
2. Adopt a policy prohibiting participation in deputy gangs as defined in Penal Code section 13670 .	Rec. A-2	Fully Implemented	The COC's recommended policy banning participation in law enforcement gangs was adopted in September 2024. The Sheriff announced the adoption of this policy	

¹ The LASD's assessment of progress in implementing the Commission's 27 Recommendations, updated October 23, 2024, has been considered in this update and incorporated, where appropriate.

² The Sheriff's Department has rejected four (4) of the Commission's 27 Recommendations, and these are noted. Otherwise, based on our current understanding, it appears that he has accepted 23 of the Recommendations, but deems some of them to be subject to a meet and confer process with ALADS and PPOA before they can be implemented.

			on September 18, 2024, effective in 30 days. It became effective on October 18, 2024. See MPP 3-01/050.82.	
3. Adopt a policy prohibiting joining or participating in deputy cliques.	Rec. A-3	Not Implemented	COC's policy recommendation banning deputy cliques is subject to a continuing Meet & Confer process with ALADS and PPOA that has been ongoing for over a year..	
4. Develop a department-wide initiative to eliminate deputy gangs/cliques.	Rec. A-4	Not Implemented	We are advised that the Sheriff has established a working group with five teams to develop this initiative. We have yet to see a draft of a written, Department-wide initiative to rid the LASD of deputy gangs and cliques.	
5. Engage labor unions (ALADS, PPOA) to support policies on deputy gangs/cliques.	Rec. A-5	Fully Implemented	The Sheriff and his representatives have met with union representatives at great length to discuss the COC's Recommendations that County Counsel opined required a meet & confer.	
6. Ensure that captains and senior executives support and implement the Sheriff's vision on gangs/cliques.	Rec. A-6	Fully Implemented	We are advised that the Sheriff has made his position re deputy (law enforcement) gangs clear to all Captains and above as well as his expectation that they will not be tolerated. However, his position on Deputy Cliques (unauthorized, exclusionary work-place related subgroups within Patrol Stations or units of the LASD) remains unclear in	

			our view. Executive leadership training and oversight structures are in place, and that prior deputy clique membership is discussed before promotions to senior ranks.	
7. Assign two Captains to 6 patrol stations with a history of active deputy cliques, such as the Banditos, Executioners, Cowboys, Regulators and Reapers.	Rec. A-7	Partially Implemented	The Sheriff has established the 2-Captain model at 3 of the 6 problematic patrol stations, for which the Board of Supervisors provided funding. The Board has yet to fund the other three.	
8. The Sheriff should implement a clear policy to eliminate deputy cliques and deputy gangs; prohibit future use of deputy tattoos that are clique-related or depict violence.	Rec. B-1	Not Implemnted	This Recommendation can not be fully implemented until there is a policy banning deputy cliques. The ban of clique-related tattoos is subject to meet and confer process, as is when and what type of authorized logos are appropriate.	
9. Investigate violations of policies banning participating in deputy gangs and deputy cliques and refer violations for disciplinary action.	Rec. B-2	Partially Implemented	No investigations of deputy law enforcement gangs or deputy cliques have been possible and no discipline imposable, because until October 2024 there was no policy prohibiting either. The Department has advised that it is inviestigating alleged violations of policy and that participating in law enforcement deputy gangs, but not particiapation in deputy cliques, as there is no policy that prohibits partipation in unauthorized and exclusionary	

			subgroups that typically have matching tattoos with offensive iconography. The LASD has advised that it is investigating violations of its anti-law enforcement gang policy, and even terminated deputies for violation of this policy, but cannot share information regarding investigations or discipline because this information is confidential under state law.	
10. Department Leadership should emphasize the adverse career consequences of joining deputy cliques or deputy gangs.	Rec. B-3	Partially Implemented	Department leadership and supervisors have been discussing the negative aspects of participating in deputy gangs/cliques for the Department and its image. But joining a deputy clique is still not prohibited by policy, which undermines this messaging. We are advised that Department leadership has organized meetings to discuss "the issues surrounding deputy gangs/cliques" at patrol station within Central and Northern Patrol Divisions.	
11. Notify the District Attorney's Office when a deputy involved in a case is linked to gangs/cliques.	Rec. B-4	Partially Implemented	We are informed by the Department that its internal notification process to the DA has been updated to comply with Brady's obligations. It does not appear, however, that this would assure notifications if a testifying deputy has been identified as member of a deputy clique. Per the	

			Department, if there is a sustained finding, after internal investigation, that a deputy has violated the LASD's new policy (eff. Oct 2024) against participating or joining a deputy (law enforcement) gang, it will be reported to the DA, if the testifying deputy is still employed by the LASD.	
12. Actively investigate violation of policy banning participation in deputy gangs and deputy cliques	Rec. B-5	Partially Implemented	The Department advises that it is investigating alleged violation of its anti-law enforcement gang policy and that individuals have been terminated for violation of that policy. It also states that there have been termination for "violation of the Department's clique policy." This statement needs to be explained in light of the fact that the Department has yet to adopt a policy banning joining or participating in deputy cliques.	
13. Train supervisors to mentor deputies on the dangers of deputy gangs/cliques.	Rec. B-6	Partially Implemented	The Commission has been advised that supervisor training is being updated to include guidance on mentoring and preventing exclusionary subgroups within units.. N.B. This Recommendation requires continued follow through.	
14. Hold community meetings to ascertain the impact of deputy gangs/cliques on the	Rec. B-7	Fully Implemented	The first and second rounds of community meeting were completed with USDOJ Community Relations	

public and public trust in the Department.			Service facilitation and is completed. CAC have been implemented at all Patrol Stations as a means of continuing the dialogue on this and other issues impacting the community.	
15. Rotate deputies to prevent the formation of deputy gangs/cliques.	Rec. C-1	Not Implemented	The Department has indicated that contract cities are concerned regarding the impact of involuntary rotation of deputy gang/clique deputies on their communities which may implicate LASD-contract city agreements. We are informed that no rotational policy implementation is planned.	Rejected. Comment: The COC is fine with putting this on the back burner, but the rejection should be evaluated, If, by December 31, 2025, the Sheriff cannot certify to the COC that deputy cliques no longer exist. If he can so certify, this Recommendation will not be necessary. As for contract cities not wanting deputy clique members assigned to them, that is understandable, but certain contract cities, e.g., Compton and Lancaster, may understandably want to have deputy clique members rotated out of patrol stations serving them.
16. Assess dual career track for Custody/Court services and provide report back	Rec. C-2	Not Implemented	After initially rejecting the Recommendation, we are informed that the Department is assessing the dual track model in light of passed experience and will keep the COC	

			advised. From the COC perspective, this recommendation is part of a broader issue regarding optimal jail staffing, which includes making Patrol a deputies first assignment, reducing the number of deputies who work Custody and deploying more to the field, i.e.. to patrol., etc. See also: Rec 17, below.	
17. Assess the feasibility of not requiring the first assignment of a new deputy to Custody	Rec. C-3	Not implemented	After initially rejecting this Recommendation, we are advised that the Department is “accessing this COC recommendation” and the evaluating the “long-term impact of this staffing approach.	This COC Recommendation should be adopted and a plan and timeline set forth for implementing it. Reasons: First, serving in Custody has tended to coarsen some deputies, as witness, e.g., the 2000 and 3000 Boys deputy cliques. Second, a first assignment to patrol would likely assisting in recruiting. Third, it will allow observation of Deputies in Patrol during their probationary period. Fourth, it will allow elimination of the 65:35 ratio (Deputies to Custody Assistants) which impairs best staffing for the Jails. It is not necessary to have 2/3rds of the jail guards in Custody Division to be

				highly-paid Deputies trained for Patrol/police work.
18. Ensure senior executives, Captains and above, are implementing the Sheriff's policy, vision and goals regarding Deputy Gangs/Cliques	Rec. D-1	Partially Implemented	Based on our discussion with Department leadership, we believe that the Sheriff is doing this regarding "law enforcement gangs." Until a policy is adopted by the LASD, it is unclear whether the Sheriff's vision and goals include prohibiting deputy participation in Deputy Cliques, i.e., unauthorized, workplace-related, exclusionary subgroups within a station or unit who often use an unauthorized logo and have matching tattoos.	
19. The OIG should monitor implementation of the COC's recommended policies banning participation in deputy Gangs and deputy cliques.	Rec. D-2	Not implemented, but not applicable to LASD. It is unclear whether the OIG is monitoring internal investigations of violations of policy prohibiting law enforcement gangs, open or closed.	Until October 2024, there were no policy prohibitions on deputy participation in deputy gangs or deputy cliques. There still are not regarding deputy cliques. There has been no implementation of policies for the OIG to monitor until the recent ban on participation in law enforcement gangs in October 2024..	
20. Consider present and former deputy gang/cliue involvement in making promotions	Rec. D-3	Partially Implemented	We are informed that promotion interviews for senior roles, Captain and above, include questions on deputy gang affiliations and that this factor is considered. Former participation is not disqualifying, provided the applicant for promotion	

			<p>genuinely supports the Sheriff's policies and vision to rid the Department of deputy gangs/cliques. Promotions below Captain and subject to the civil service examination process. Per the LASD, only sustained discipline for violation of LASD policy can be considered regarding these promotions. Accordingly, participation in even former participation in deputy gangs is not a factor, unless after October 2024. Current or former participation in a Deputy Clique is not a factor that the LASD considers for promotions up to the rank of Lieutenant.</p>	
<p>21. Develop a standard set of questions regarding a deputy's current affiliations within force reviews and internal investigations</p>	Rec. D-4	Partially implemented	<p>We are informed by the Department that it has "through Internal Affairs, established a list of questions to be used in internal and criminal investigations." It is unclear whether these questions implement this Recommendation.</p>	
<p>22. Ensure captains are notified of deputies involved in force incidents have deputy gang/clique affiliations.</p>	Rec. D-5	Fuly Implemented	<p>We are advised by the Department that Captains will be notified through an updated PRMS system being piloted. We are also advised that if a deputy is "determined to be affiliated with a law enforcement gang and/or clique during the course of an investigatin, the repsectve captains ... are notified by PSD command staff.</p>	

			Commission has yet to see these updated policies.	
23. Implement the Comp/Stat (SCIF) process to risk management for indicators of deputy gangs/cliques within patrol stations.	Rec. D-6	Partially Implemented (?)	We are advised that there is an integration at crime and risk management meetings, the Risk Management Forum, that include gang/clique indicators. The Commission's Ad Hoc Committee on Depouty Gangs/Cliques would like a briefing on indicators and why the Department's Command Staff was unaware of the Industry Indians and a possible Deputy Clique at Norwalk Station. Also, it does not appear that the LASD has a truly robust CompStat process, which is needed to assure accountability and adherence to policy..	
24. Ensure that captains hold lieutenants and sergeants accountable for deputies under their supervision that are involved in deputy gangs/cliques.	Rec. D-7	Partially implemented	Captains cannot hold suborndiantes accountable for subordinates who are member of deputy cliques until there are clear policies banning participation by deputies in deputy cliques. Currently, such participation does not violate LASD policy. Starting in October 2024, this is now possible regarding a deputies involved deputy/ law enforncement gangs.	
25. Ensure that sergeants actively and recurrently mentor deputies regarding	Rec. D-8	Partially implemented	Until October 2024, LASD policy prohibited neither. We are informed that the Department is overhauling its	

policies prohibiting joining and participating in deputy gangs and deputy cliques..			Performance Mentoring Program (PMP) to track mentoring more effectively and the mentoring will include actively discussing and mentoring against participation in deputy gangs and cliques.	
26. Flatten the chain of command for better oversight.	Rec. D-9	Not Implemented.	It does not appear that the Sheriff is doing anything to address the decentralization of Patrol from Department headquarters, which the Commission has identified as contributing to the Department's troubled history of exclusionary deputy cliques. We were advised that the Sheriff does not plan to remove any of the layers of command.	Rejected. This should be reconsidered. The degree of autonomy of patrol stations captains has led to hiding the ball and a head-in-the-sand mentality at the Patrol Station level and has unquestionably contributed to the culture of deputy cliques/gangs within the Department. There are too many layers between station captains and the Sheriff to assure that the Sheriff is informed and is in a position to insist field accountability with policy. If nothing else, a study re how the current organization structure potentially adversely affects management efficiency and polic compliance seems warranted.
27. Make prohibition on joining deputy gangs/cliques a condition of employment.	Rec. D-10	Fully Implemented	New hires are required to sign acknowledgments of the prohibition	

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Totals:

6 Recommendations *Fully Implemented*

13 Recommendations *Partially Implemented*

8 Recommendations *Not Implemented* (two of which have been rejected and one of which is not applicable to the LASD)