



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ROBERT G. LUNA, SHERIFF



February 4, 2025

Sharmaine Moseley, Executive Director  
Sheriff Civilian Oversight Commission  
World Trade Center  
350 South Figueroa Street, Suite 288  
Los Angeles, California 90071

Via Electronic Submittal

Dear Ms. Moseley:

**UPDATE ON THE 2023 RECOMMENDATIONS OF  
THE CIVILIAN OVERSIGHT COMMISSION ON DEPUTY GANGS/CLIQUEs**

Attached please find the Los Angeles County Sheriff's Department's self-assessment of its progress with the recommendations made in the Civilian Oversight Commission's 2023 Report entitled: "Report and Recommendations of the Special Counsel to Sheriff Civilian Oversight Commission Regarding Deputy Gangs and Deputy Cliques in the Los Angeles County Sheriff's Department."

Should you have any questions, please do not hesitate to contact me.

Sincerely,

ROBERT G. LUNA, SHERIFF

*April L. Tardy*  
APRIL L. TARDY  
UNDERSHERIFF

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## COC Report Recommendations (Updated February 3, 2025)

### Notes:

- This summary reflects the Los Angeles County Sheriff's Department's ("Department") assessment of its progress in adopting the COC recommendations from its 2023 report entitled: "Report and Recommendations of the Special Counsel to Sheriff Civilian Oversight Commission Regarding Deputy Gangs and Deputy Cliques in the Los Angeles County Sheriff's Department."<sup>1</sup>
- Many recommendations require ongoing and continuing efforts by the Department.
- The color coding of the recommendations reflects the following:
  - green - represents those recommendations which are completed or significantly in progress;
  - yellow - represents those recommendations for which planning, or adoption are underway;
  - red - represents recommendations about which the Department disagrees with the specific recommendation but for which the department is adopting a different approach, or will undertake further review; and
  - gray - represents the one recommendation that is not directed at the Department.

	RECOMMENDATION	SPECIFICS OF RECOMMENDATION (edited summary from report) <sup>2</sup>	STATUS
	<b>LEADERSHIP AND SUPERVISION (7)</b>		
1.	1. The Sheriff must clearly, promptly, and unequivocally articulate his vision, policies, and objectives in addressing the problem of Deputy Gangs and Deputy Cliques.	<ul style="list-style-type: none"> <li>• Promptly announce that Deputy Gangs and Deputy Cliques will no longer be tolerated.</li> <li>• Make clear that this is a top priority.</li> <li>• State intention to make this happen immediately.</li> </ul>	<p>The Sheriff's actions include the following:</p> <ul style="list-style-type: none"> <li>• sent out a written message to all personnel;</li> <li>• speaking, on an ongoing basis, to all management;</li> <li>• speaking, on an ongoing basis, to Supervisor Training classes;</li> <li>• speaking, on an ongoing basis, to all academy classes;</li> <li>• speaking, on an ongoing basis, to all Chiefs (individually and collectively); and</li> </ul>

<sup>1</sup> Sheriff Civilian Oversight Commission, Report and Recommendations of the Special Counsel to Sheriff Civilian Oversight Commission Regarding Deputy Gang and Deputy Cliques in the Los Angeles County Sheriff's Department. Los Angeles, CA: Special Counsel to the Commission, 2023.

[1138014-DeputyGangsSpecialCounselReporttoCOC3.2.2023.PDF.PDF \(lacounty.gov\).](https://www.lacounty.gov/1138014-DeputyGangsSpecialCounselReporttoCOC3.2.2023.PDF.PDF)

<sup>2</sup> For full details about the recommendation, please see the report referenced in footnote 1.

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		<ul style="list-style-type: none"><li>• Promptly adopt policies calculated to achieve this goal and see that these policies are enforced.</li></ul>	<ul style="list-style-type: none"><li>• speaking, on an ongoing basis, to all Captains and above.</li></ul>
2.	2. Adopt a policy that clearly prohibits deputies from participating in Deputy Gangs, as defined in Penal Code Section 13670.	<ul style="list-style-type: none"><li>• No Sheriff has adopted a policy banning participation in such groups.</li><li>• The legislature mandated that every law enforcement agency “shall maintain a policy that prohibits participation in law enforcement gangs and make violation of that policy grounds for termination.” PC Section 13670(b).</li><li>• Such policy should be adopted without further delay.</li></ul>	<p>The Penal Code Section 13670 policy was drafted, negotiated with labor through the meet and confer process, and published. It became effective on October 18, 2024 (30 days following publication).</p> <p>The new policy can be found at MPP 3-01/050.82: Prohibition – Law Enforcement Gangs and Hate Groups <a href="#">3-01/050.82 - Prohibition - Law Enforcement Gangs and Hate Groups - PARS Public Viewer</a></p> <p>As of January 31, 2025, 99.6% of the sworn members of the Department have read and acknowledged the contents of the new policy.</p>
3.	3. Adopt a policy that prohibits deputies from joining, participating in, and soliciting others to join Deputy Cliques.	<ul style="list-style-type: none"><li>• It will not be enough merely to prohibit participation in deputy or law enforcement “gangs.”</li><li>• Ending this problem requires a prohibition against joining and participating in Deputy Cliques.</li><li>• Violators of the policy would be subject to discipline, up to and including termination.</li><li>• All Deputy Gangs have sprung from Deputy Cliques, and the</li></ul>	<p>The policy was drafted, reviewed both internally and by county counsel, sent to the COC and OIG for review.</p> <p>The policy is currently in the meet and confer process.</p>

RECOMMENDATION	SPECIFICS OF RECOMMENDATION (edited from report)	STATUS OF THE RECOMMENDATION
		clique-culture is deeply embedded in the Department.
4.	4. The Sheriff should develop a departmentwide initiative to end Deputy Gangs and Deputy Cliques.	<p>• The elimination of these groups requires buy-in at all levels of the Department.</p> <p>• Announce a department-wide initiative banning Deputy Gangs and Deputy Cliques.</p> <p>• All executives, managers, and supervisors must be openly and unequivocally committed to conveying the Sheriff’s policy, and objectives to Department personnel.</p> <p>The Sheriff directed the Undersheriff to organize this initiative. In the Spring of 2023, the Undersheriff created the Deputy Clique Focus Group, which meets regularly to discuss issues surrounding deputy gangs/cliques. The Focus Group is comprised of five teams, and the participants have grown steadily since inception, and now include almost all components of the Department. The Focus Group meets monthly (either as a full group, or through its committees), and the five teams work independently of each other to achieve their objectives. Each team consists of Department personnel from all divisions, bureaus, stations, facilities, and units. Each team is expected to provide status updates at the full Focus Group meetings.</p> <p>The five teams are:</p> <ul style="list-style-type: none"> <li>• Training</li> <li>• Media</li> <li>• Cultural Consultants</li> <li>• Central Patrol</li> <li>• Messaging</li> </ul> <p>The efforts of this group are ongoing, with meetings held regularly. Two members of the OIG regularly attend the focus group meetings.</p> <p>Representatives of the Department’s labor unions representing sworn personnel are now attending the meeting.</p>

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5	<p>5. The Sheriff should seek the support of ALADS and PPOA, for his vision, policies and objectives regarding Deputy Gangs and Deputy Cliques.</p>	<p>ALADS and PPOA need to be part of the solution and recognize that the elimination of Deputy Gangs and Deputy Cliques is in the overall best interests of their members.</p> <p>Meetings and discussions with labor began following publication of the report. Ongoing discussions have taken place with labor about related policies in the meet and confer process. The Department agrees that a strong relationship with labor will assist in creating positive progress. The Sheriff also engaged the assistance of Mr. Steve James, a labor expert, to ensure strong collaboration with labor on a variety of issues including addressing recommendations in the report.</p> <p>Both ALADS and PPOA now send representatives to the Focus Group meetings described in the above recommendation (item 4).</p>
6.	<p>6. Any captain who is unable or unwilling to support the Sheriff's policy without reservations should be subject to appropriate discipline ranging from transfer to a less critical position with little or no presence of Deputy Gangs and Deputy Cliques to termination for insubordination in the Sheriff's considered</p>	<p>No explanation is provided in report, presumably because the recommendation is self-explanatory.</p> <p>The Sheriff made his position clear to all Captains and above and has addressed his expectations repeatedly.</p> <p>Furthermore, during the captain interview process, candidates are asked questions to illicit information about law enforcement gangs and cliques, including their relevant experiences in the Department, and their plan to address this issue and all compliance issues.</p> <p>Captains attend "Captains College" which is ongoing training for new and existing captains. The Sheriff and Undersheriff both speak about their expectations of all Captains, issues related to Law Enforcement gangs are discussed, and issues related to overall compliance are also addressed.</p>

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	judgment and pursuant to required due process.	On February 4, 2025, the Sheriff held a meeting of all patrol captains, to reinforce his approach to this issue.
7.	<p>7. The Department should consider assigning a senior captain and a newly promoted captain to larger, high activity stations to ensure maximum supervision and mentoring of lieutenants and sergeants while retaining full accountability within the paramilitary structure of the Department.</p>	<p>Assigning two captains to larger, busier patrol stations, particularly those with a history of entrenched Deputy Gangs and Deputy Cliques, will enhance the ability of captains to address the continuing problem of these groups and help ensure that such groups will not be formed in the future.</p> <p>The Department submitted a budget request in Fiscal Year 2023-24 for six additional Captains to implement the COC recommendation. The BOS approved funding for three additional Captain positions (who were assigned to Palmdale, Lancaster, and East Los Angeles stations).</p> <p>The Department submitted a budget request in FY 2024-25 for the three additional Captain positions to have the two-captain model at three additional patrol stations and the request was not funded.</p> <p>The Department also issued a report demonstrating the significance of the two-captain model, and provided it to the Civilian Oversight Commission.</p> <p>A copy of this report can be found:  <a href="#">Transparency_oversight_LASD_Rpt-on-2-Capt-Model.pdf</a></p>
	<b>POLICY AND TRAINING (7)</b>	
8.	<p>1. As set forth in recommendations A (2) and A (3) above, the Sheriff should adopt and promptly implement a clear policy to address the need to eliminate Deputy Gangs and Deputy Cliques</p>	<ul style="list-style-type: none"> <li>• Bar all deputies from joining, participating in, or soliciting others to join Deputy Gangs and Deputy Cliques.</li> <li>• Promulgate additional policies, including: <ul style="list-style-type: none"> <li>• a policy that prohibits new deputies hired after the date of the</li> </ul> </li> </ul> <p>The policy with respect to Law Enforcement Gangs has been adopted.</p> <p>The policy related to tattoos was drafted, reviewed both internally and by county counsel, and sent to the COC and OIG for review. The policy is currently in the meet and confer process.</p>

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<p>and prohibit tattoos that depict violence which must be supported and explained by the Sheriff's leadership team.</p>	<p>issuance of Recommendations A (2) and A (3) from having tattoos that depict violence, the use of deadly force or any iconography that might reasonably be found offensive to the public.</p> <ul style="list-style-type: none"> <li>• Current Department members should also be prohibited from acquiring such tattoos after the date of the issuance of the policy.</li> <li>• Any current Department member who acquired a Deputy Gang or Deputy Clique tattoo prior to the adopting of the policy should be required to ensure that it is not visible while the member is on-duty, on Department or County property, or is representing the Department away from the workplace.</li> <li>• A review of stations and jails should be conducted to determine which facilities have unprofessional station/jail/bureau logos.</li> <li>• Unit commanders should be accountable for the removal of decals, flags, bumper stickers, decorations, or other depictions of unprofessional symbols inappropriate for representing Department units.</li> </ul>	<p>The policy related to logos was drafted, reviewed both internally and by county counsel, and sent to the COC and OIG for review. The policy is currently in the meet and confer process.</p>



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		<ul style="list-style-type: none"><li>• All managers and supervisors must be responsive to the existence of graphics or other symbols representing prohibited Deputy Gangs or Deputy Cliques or offensive station/jail/bureau logos such as “Ghetto Birds” or “Ft. Apache.”</li><li>• They should be removed, and misconduct investigations should be initiated to determine which personnel are responsible for such graphics or symbols if they reappear in the future.</li></ul>	
9.	2. The Department should investigate violations of the policy banning joining or participating in Deputy Gang and Deputy Cliques and refer violations for discipline.	<ul style="list-style-type: none"><li>• A primary consequence of any violation of the Sheriff’s policies regarding Deputy Gangs or Deputy Cliques should be a misconduct investigation followed by appropriate discipline which should range from suspension through demotion to discharge consistent with due process.</li><li>• Department personnel should also be advised that the Department will enforce Penal Code Section 13670.</li></ul>	<p>The Department is investigating and will continue to investigate alleged violations of the policies related to law enforcement gangs or cliques. Ongoing investigations are confidential, and the details of which cannot be made public both due to provisions of California law and for the integrity of the ongoing investigations.</p> <p>For the first time since the inception of policies related to law enforcement gangs and cliques, the Department has terminated individuals for violation of the Department’s policy in these areas. Other investigations are ongoing.</p> <p>Department personnel have been advised that the Department will enforce Penal Code Section 13670. In fact, all sworn personnel have received an electronic copy of the new policy and Penal Code 13670 and have been asked to electronically acknowledge that they read and understand</p>



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		<p>the policy. The policy specifically states: “Department members shall not participate in, solicit others to participate in, or be members of a law enforcement gang... Such conduct shall be subject to discipline, up to and including termination, pursuant to Penal Code section <a href="#">13670(b)</a>.” As described more fully below, new recruits also must sign an acknowledgement form as a condition of employment.</p> <p>On February 4, 2025, the Sheriff held a meeting of all patrol captains, to reinforce the importance of investigating all allegations.</p>
10.	<p>3. The Department’s leadership team should consistently and recurrently emphasize the adverse career consequences of creating or joining a Deputy Gang or Deputy Clique.</p>	<ul style="list-style-type: none"> <li>• Although this task belongs to personnel of every rank, the time commitment must increase with each successively lower rank.</li> <li>• Notwithstanding the importance of a captain-level manager to set the tone for deputies, lieutenants and sergeants, lieutenants and sergeants spend the most time with deputies.</li> <li>• They therefore must be most accountable for communicating to deputies under their supervision the adverse consequences of becoming involved with Deputy Gangs and Deputy Cliques.</li> <li>• Captains ultimately are responsible for and must be held</li> </ul> <p>During 2023 and 2024, Central Patrol and North Patrol Divisions (Divisions which have stations mentioned in the COC report) organized a series of meetings at patrol stations to discuss the issues surrounding deputy gang/cliques.</p> <p>In Central Patrol, for example, Department leadership communicated about this topic with its captains on a regular basis and during staff meetings. Specifically, the Division Chief and Commanders of Central Patrol Division have been making visits to the stations to discuss this topic in person with not only the station captains, but with the lieutenants, sergeants, deputies, and professional staff.</p> <p>Central Patrol Division Command staff have been to following stations:</p> <p><b>Century</b> (May 5, 2023, and May 29, 2024. Approximately 30-40 personnel were present at each visit).</p>

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		<p>accountable for the performance of lieutenants and sergeants.</p> <p><b>Compton</b> (August 23, 2023, and April 25, 2024. Approximately 30 personnel were present at each visit).</p> <p><b>East Los Angeles</b> (August 17, 2023, and June 5, 2024. Approximately 30-40 personnel were present at each visit).</p> <p><b>South Los Angeles</b> (June 1, 2023, and March 6, 2024. Approximately 30 personnel were present at each visit).</p> <p>The primary messages relayed included:</p> <ul style="list-style-type: none"> <li>• the adverse career consequences of creating or joining a Deputy Gang or Deputy Clique with their personnel; and</li> <li>• the Departments Policy regarding Deputy Gangs/Cliques, Penal Code 13670, and SB2.</li> </ul> <p>In addition, command staff have:</p> <ul style="list-style-type: none"> <li>• discussed their own stories of success within the Department with their personnel;</li> <li>• emphasized that deputies do not need to belong to a clique to have a great career.</li> <li>• trained supervisors in mentoring deputies about the adverse consequences of involvement in Deputy Gangs and Deputy Cliques;</li> <li>• required captains to discuss this topic with their lieutenants and sergeants on a regular basis;</li> <li>• required station captains to instruct their lieutenants and sergeants to brief this topic regularly with their deputy personnel;</li> <li>• required station captains to address this issue with community members and government officials during community events, town halls, city council</li> </ul>

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		<p>meetings, as well as other community conversation opportunities; and</p> <ul style="list-style-type: none"> <li>• are involved with the Deputy Clique focus group to ensure Central Patrol command staff to immediately share any updates stemming from the fruits of the group's work.</li> </ul> <p>A ROAR Training component (by Cpt Deedrick) - as part of the 4 day training program, includes the issue of Deputy cliques/subgroups as a destabilizing factor. Cpt. Deedrick reports honest and robust discussions (which deputies reported as very positive and helpful in addressing the issue). The discussion was open and honest and allowed personnel to discuss their views.</p> <p>Assistant Sheriff Johnson and Chief Castellano have taught several ethics classes during sergeant supervisory school, which addresses deputy gangs and cliques (including 13670 PC, our policies, and the role supervisors play in changing the culture).</p> <p>The two-captain model in the AV has allowed the captains more time to coach and mentor personnel, leading to an increase in accountability. The topic of deputy gangs and cliques is discussed at every FTO meeting by all captains. The discussion is led by Commander Mark Reyes who attends all FTO meetings in North Patrol Division to ensure this topic is properly being briefed and discussed.</p> <p>On February 4, 2025, the Sheriff held a meeting of all patrol captains, to reinforce this message and during which meeting the Captains were given tools to use to prompt robust discussions about the adverse consequences involved.</p>

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<p>11 4. The Department must implement a procedure for notifying the District Attorney's Office if a deputy testifying as a witness participates in a prohibited Deputy Gang or Deputy Clique.</p>	<ul style="list-style-type: none"> <li>• Compliance with Federal and State law, including compliance with <i>Brady v. Maryland</i> (1963) 373 U.S. 83, requires the District Attorney's Office to disclose if a deputy testifying as a prosecution witness participates in a prohibited Deputy Gang or Deputy Clique that might bear upon the witnesses' credibility.</li> <li>• Consult with the District Attorney's Office to devise an appropriate procedure for the Department to notify the District Attorney's Office that a deputy is participating in a prohibited Deputy Gang or Deputy Clique so that prosecutors can make the required disclosures, if any, to the defense.</li> </ul>	<p>The Department worked with representatives of the District Attorney's Office on ensuring that the Department's Brady system is consistent with standard practices. The Department alerts the District Attorney's Office (and the LA City Attorney) of sustained allegations that constitute Brady information on officers that are subpoenaed to testify in criminal cases. The Department procedures include any sustained allegation of violations of the Law Enforcement gang/clique policy. Although, the Department notes that it is unlikely that a Department Member will be reported since they will likely be terminated once found to have violated such policies.</p> <p>While the Department has made the above changes, it continues to evaluate its Brady practices to ensure it is effective.</p>
<p>12. 5. The Department should actively investigate violation of the policy prohibiting joining, participating in, or soliciting deputies to join Deputy Gangs and Deputy Cliques</p>	<ul style="list-style-type: none"> <li>• Sheriff Luna should remedy the Department's longstanding failure to investigate Deputy Gangs and Deputy Cliques.</li> <li>• The Department should make reasonable efforts to learn whether deputies continue to participate in such groups, as the Department did in 1973 with the Little Red Devils</li> </ul>	<p>As noted in item 2 above, the Department is investigating and will continue to investigate alleged violations of the policies related to law enforcement gangs or cliques. Ongoing investigations are confidential, and the details of which cannot be made public both due to provisions of California law and for the integrity of the ongoing investigations.</p> <p>Referrals to prosecuting authorities have been made in appropriate cases.</p>

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		<p>and in 2013 with the Jump Out Boys.</p> <p>For the first time in the Department's history, individuals have been terminated for violation of the Department's clique policy.</p> <p>On February 4, 2025, the Sheriff held a meeting of all patrol captains, to reinforce this message. The inquiry and investigative process and procedures were discussed to ensure the importance of investigating these matters was reinforced.</p>
13.	6. The Department should train supervisors in how to mentor deputies about the adverse consequences of involvement in Deputy Gangs and Deputy Cliques.	<p>In 2016 the Department initiated a departmentwide mentoring program for deputy personnel named the "Sergeants' Mentoring Initiative." The objective of the program was to equip and inspire the sergeants to provide to their deputies meaningful, practical, recurrent mentoring about decision-making and conduct in law enforcement and custodial services. The program was designed to (1) emphasize the high aspirations associated with public safety services, (2) stress the importance and difficulty of the decisions required of peace officers, (3) acknowledge the temptations and pressures prevalent in law enforcement, and (4) enhance deputies' capacity to apply foresight, perspective, and wisdom</p> <p>As noted above, Department leadership:</p> <ul style="list-style-type: none"> <li>• sent out a written message to all personnel;</li> <li>• is regularly speaking with Department Members;</li> <li>• is regularly speaking to Supervisor Training classes; and</li> <li>• is speaking to all academy classes.</li> </ul> <p>The concepts listed here are being included in the revised training. Curriculum in Supervisor School, FTO School, Patrol School, and classes assigned to individuals who have been subjected to discipline, is currently being updated to provide sections to address the issue of law enforcement gangs and cliques.</p> <p>John Haynes, Captain of Training Bureau's Advanced Officer Training, reports:</p> <p>Deputy Gangs are addressed in the following classes at Training Bureau:</p> <p><b><u>Recruit Training</u></b></p> <ul style="list-style-type: none"> <li>• <b>Sheriff Luna</b> talks to each recruit class on the topic of Deputy Gangs and prohibited behavior.</li> </ul>

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		<p>to their decision- making and conduct.</p> <p><b><u>Supervisor School, Field Training Officer School, Patrol School, Life Class (Decision Making).</u></b></p> <ul style="list-style-type: none"> <li>• The topic of Deputy Gangs and Prohibited behavior is addressed by the <b>Captain</b> or Class Instructor of Training Bureau in each of the above classes held at Training Bureau.</li> <li>• MPP 3-01/050.82, Prohibition- Law Enforcement Gangs and Hate Groups, is provided as a handout to each student and the policy is reviewed in class.</li> <li>• Discussion is facilitated regarding Penal Code section 13670(a)(2), and topics pertaining to perception, transparency, and building community trust.</li> <li>• Sheriff Luna also presents at Supervisor School and addresses the topic.</li> <li>• Master Field Training Officers address the deputy gang topic in FTO School</li> </ul> <p>Training Bureau has in development a training aid in the form of a training bulletin that will assist supervisors with mentoring deputies about the adverse consequences of involvement in Deputy Gangs and Deputy Cliques as well as associated tattoos. The bulletin addresses prohibited behavior issues and provides questions a supervisor can ask deputies to facilitate discussion. Although a pilot, the bulletin has been used in the last Supervisor School, Patrol School, and Life Class. It has proven to facilitate discussion and will be useful at station briefings.</p> <p><b><u>Classes held in 2024:</u></b></p> <ul style="list-style-type: none"> <li>• (5) Recruit classes= 237 recruits</li> <li>• (6) Patrol Schools= 266 deputies</li> </ul>

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			<ul style="list-style-type: none"> <li>(5) Supervisor Schools= 143 supervisors</li> </ul> <p>In a separate section, the Department has addressed the overall mentoring program (Performance Mentoring Program).</p> <p>On February 4, 2025, the Sheriff held a meeting of all patrol captains, to reinforce the importance of addressing this issue, and in mentorship. In addition, Captains were given tools to use to prompt robust discussions about the adverse consequences involved. A training bulletin was provided to assist in having important conversations on the topic.</p>
14	7. The Department should implement a series of community meetings involving patrol station captains, commanders, and chiefs to ascertain the impact of Deputy Gangs and Deputy Cliques on community relations.	<ul style="list-style-type: none"> <li>The Department should implement at every station a Community Advisory Committee (“CAC”).</li> <li>The committees should consist of community members who have been vocal in their criticisms of law enforcement in addition to station “boosters” who volunteer for membership.</li> <li>The topic of Deputy Gangs and Deputy Cliques must be an agenda item of these meetings.</li> </ul>	<p>The Department engaged the United States Department of Justice, Community Relations Service to help facilitate the meetings.</p> <p>The Department has drafted a report on these community meetings, which will be provided to the Civilian Oversight Commission by the end of the week. The Report can be found at:  <a href="#">Transparency Oversight Community Engagement Report-October 2024.10.29.24.pdf</a></p> <p>CACs now exist at all patrol stations.</p>
	<b>RE-DEPLOYMENTS AND ROTATIONS (3)</b>		
15.	1. The Sheriff should use his authority to re-deploy and rotate deputies based	<ul style="list-style-type: none"> <li>Consider making such re-deployments or transfers within a geographic patrol or custody</li> </ul>	Currently, the Department is not inclined to implement this recommendation. It should be noted that many Contract Cities, who contract for law enforcement services with the



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	upon the needs of the Department for the Department to eliminate the formation and re-emergence of Deputy Gangs and Deputy Cliques.	<p>division, where possible, to avoid undue hardships.</p> <ul style="list-style-type: none"> <li>• Consider rotating all patrol deputies (after completion of field training) no later than the end of their first year in patrol to another patrol station within the Division.</li> <li>• Consider rotating all patrol deputies in periodic rotations, no longer than every five years, or sooner, to another station.</li> </ul>	<p>Department in many areas throughout the County, strongly oppose this proposal. Consistent with community policing concepts, many contract cities seek consistent policing services from Department members who know their community, know residents, and understand the specific needs of their individual communities.</p> <p>The Department will re-evaluate this recommendation should the situation warrant it and should other recommendations not achieve their desired impact.</p>
16.	2. The Department should reassess the dual career track for Custody/Court Services and provide a written report to the COC explaining what factors impede implementation.	Having more deputies in Custody or Court Services who want careers in those Divisions may allow other deputies to go directly to patrol from the academy or shorten the time that other deputies spend in Custody after the academy.	<p>The Department is assessing this COC recommendation. The Department previously instituted a dual track system and ultimately decided to discontinue its usage because Lieutenants and Sergeants with patrol experience proved to be valuable resources in the custody environment, due to their experience and enhanced investigative skills and due to their ability to mentor young deputies to become more well-rounded. In addition, having a greater number of patrol-trained personnel enhanced the ability of the Department to deploy field personnel during emergency situations. Furthermore, Custody Division has sufficient interest in all ranks to maintain staffing consistency and continuity. The Dual Track Career Path, if re-instituted, would require labor negotiations as they have concerns based on the prior implementation of the plan. Nevertheless, the Department is evaluating this recommendation and will advise the COC of its final determination.</p>

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17.	3. The Department should assess the feasibility of first assignments to patrol rather than jail facilities and provide a written report to the COC explaining what factors exist, if any, impede implementation.	No explanation provided/self-explanatory.	The Department is assessing this COC recommendation. As a practical matter, due to the desire of some personnel to remain in Custody Operations and due to the needs of Patrol Operations, some academy graduates are proceeding directly to patrol rather than to custody. This is being done to address the complex staffing needs of the Department, due to staffing shortages and the need to properly staff patrol stations. The Department will be evaluating the long-term impact of this staffing approach and will advise the COC of its final determination.
	<b>ACCOUNTABILITY (10)</b>		
18.	1. The Sheriff should ensure that senior executives and unit leaders, notably captains and commanders, are implementing the Sheriff's policy, vision and objectives regarding Deputy Gangs and Deputy Cliques.	<ul style="list-style-type: none"> <li>• A segment of the weekly Executive Planning Council meeting should be devoted to discussion of the progress of the initiative to end Deputy Gangs and Deputy Cliques.</li> <li>• Identified obstacles should be remedied quickly.</li> </ul>	<p>Discussions take place regularly at Department meetings. All Senior Executives are aware of the importance of this issue.</p> <p>On February 4, 2025, the Sheriff held a meeting of all patrol captains, to reinforce the importance of investigating all allegations.</p>
19.	2. The Office of Inspector General should monitor implementation of the policy banning, joining, or participating in Deputy	COC requests the Office of Inspector General to deploy its resources as additional "eyes and ears" to ensure the policy recommendations A (2) and A (3)	Recommendation not applicable to the Department, as it is directed to the Office of Inspector General.

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	Gangs and Deputy Cliques.	are implemented fully and with alacrity.	
20.	3. Promotional considerations should include an evaluation of evidence that a member under consideration for a promotion is currently involved in a Deputy Gang or Deputy Clique, including the nature and extent of the member's involvement and whether it was before or after the date of the policy issued by the Sheriff.	<ul style="list-style-type: none"> <li>• Past administrations have promoted tattooed Deputy Gang members to the highest levels of leadership in the Department.</li> <li>• Promoting Deputy Gang members reinforces the power of Deputy Gangs and Deputy Cliques and undermines the ability of officials to implement reforms aimed at eliminating them,</li> <li>• Inquire if a deputy under consideration for a promotion is or was Deputy Gang or Deputy Clique affiliated and must carefully evaluate the Department wide implications of promoting those who actively participated in such groups.</li> </ul>	<p>Promotional decisions for positions lower than Captain are selected through the civil service examination process. However, even with this process a review of prior work history including discipline records are reviewed.</p> <p>All candidates for the position of Captain or above are interviewed and are asked questions designed to elicit information regarding Deputy Gangs/Cliques. In addition, the personnel records, including disciplinary history, of candidates for these promotions are evaluated.</p>
21.	4. The Department should include a standard set of questions regarding a deputy's current affiliations with Deputy Gangs or Deputy Cliques in the use of force review	<ul style="list-style-type: none"> <li>• This recommendation does not assume a <i>per se</i> causal connection between membership in a Deputy Gang or Deputy Clique, or the fact that a deputy has a tattoo reflecting involvement in such a group, and unlawful use of force or</li> </ul>	The Department, through Internal Affairs, has established a list of questions to be used in internal and criminal investigations.

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<p>process and in administrative and internal criminal investigations.</p>	<p>misconduct. It is, however, important to recognize that the community widely assumes such a causal connection.</p> <ul style="list-style-type: none"> <li>• Questions must enable an assessment of the possibility or likelihood of a connection, without any presumption.</li> <li>• If there is evidence indicating even a possible connection between a deputy's membership in a Deputy Gang or Deputy Clique and a use of force incident or misconduct, investigative steps should be taken to determine the nature and extent of the connection.</li> <li>• In any such cases, the Office of the Inspector General should be notified and asked to monitor the progress of the investigation.</li> </ul>	
<p>22. 5. The Department should ensure that captains are notified of deputies involved in force incidents or personnel misconduct investigations who have affiliations with Deputy Gangs or Deputy Cliques, including tattoos</p>	<ul style="list-style-type: none"> <li>• Codify this recommendation as a rule in the Department Manual of Policy and Procedures.</li> <li>• The responsibility for making this notification will normally fall to an investigator at the captain's own unit of assignment, or to an Internal Affairs Bureau or to Internal Criminal Investigations Bureau investigator.</li> </ul>	<p>Captains have access to the records of all Deputies within their command through the existing PRMS system. Furthermore, the newly developed data dashboard systems make access to critical information easier. This system was piloted in North Patrol, and other Divisions are now being trained on the system. The Department is evaluating, and will continually evaluate, whether there are better methods to keep captains informed. Furthermore, if an employee is determined to be affiliated with a law enforcement gang and/or clique during the course of an investigation, the</p>

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	associated with such groups.	<ul style="list-style-type: none"> <li>• Anyone who obtains such knowledge must promptly notify the concerned captain, either directly or through the chain of command.</li> </ul>	respective captains (and chain of command) are notified by PSD command staff.
23.	6. The Department should ensure that the CompStat process for risk management indicators regarding the existence of Deputy Gangs or Deputy Cliques within a patrol station or other Department unit is implemented and is effective in assessing the risk mitigation efforts of unit commanders	<ul style="list-style-type: none"> <li>• Track force incidents by shifts or deputy partners, checking for, and assessing, patterns that may indicate the need for re-assignments, transfers, or discipline.</li> <li>• Implement a “performance mentoring” process, overseen by Risk Management Bureau (“RMB”).</li> <li>• The object of the program should be to identify “at-risk” employees by means of the automated “early identification and intervention system”.</li> </ul>	<p>The Department utilizes a Risk Management Forum (RMF) to evaluate risk management indicators.</p> <p>As part of this process, the Department has recently developed dashboards, and other systems to evaluate force and assess trends and patterns. The program will help identify at risk behaviors that need to be evaluated and addressed (an early intervention system), and individuals who appear to be most engaged in those behaviors. The objective of the evaluation will be to address these behaviors early through training, supervision, and mentoring.</p> <p>The Performance Mentoring Program (“PMP”) is described in further detail below.</p> <p>In addition, the Risk Management Forum (“RMF”) process has been revised to include discussions on this topic to include efforts captains and their unit leadership undertake to discuss this topic with deputies, including internal investigations, litigation, and other matters. The expectations of the Department are also discussed at this time, and reinforcement of the zero-tolerance policy toward this issue.</p>

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24.	<p>7. The Department must ensure that captains hold sergeants and lieutenants accountable for deputies under their supervision involved in Deputy Gangs and Deputy Cliques.</p>	<ul style="list-style-type: none"> <li>• It is essential that captains and lieutenants back up sergeants who face insubordination from members of Deputy Gangs and Deputy Cliques.</li> <li>• They must assess lower ranking managers and supervisors as to their commitment to convey, support and enforce the Sheriff's vision and intentions about Deputy Gangs and Deputy Cliques.</li> <li>• Failure on the part of a captain to meet this obligation should be grounds for transfer or other appropriate employment action.</li> </ul> <p>As noted above, the Department is investigating and will continue to investigate alleged violations of the policies related to law enforcement gangs or cliques. Ongoing investigations are confidential, and the details of which cannot be made public both due to provisions of California law and for the integrity of the ongoing investigations. Captains, sergeants, and lieutenants who are found to have supported these activities, or ignored these activities, will similarly be held accountable. This is a current requirement in the Department.</p> <p>At the Risk Management Forum, there is additional oversight of the Captains, by the Undersheriff, into the efforts the Captains are making to ensure those in their chain of command are taking appropriate action to address deputies who are violating policy.</p>
25.	<p>8. The Department must ensure that sergeants actively and recurrently mentor deputy personnel and enforcement of the policy prohibiting Deputy Gangs and Deputy Cliques.</p>	<p>First, the Department has overhauled its Performance Mentoring Program (PMP), to modernize the system, track performance more effectively, and track mentoring more effectively. Included in this revised process is:</p> <ul style="list-style-type: none"> <li>• The new law enforcement gang policy will be discussed at the initial meeting between the unit commander and the mentee.</li> <li>• The mentee will electronically acknowledge within the PMP system that the policy was reviewed with them.</li> <li>• The law enforcement gang policy will be uploaded to the PMP SharePoint resource page for easy reference by all PMP mentors and mentees.</li> </ul>

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		<ul style="list-style-type: none"> <li>The PMP Manual will include the issue of participation and alleged participation in a law enforcement gang/cliue among the areas for discussion when a) the unit commander is assessing a candidate for PMP; and when b) the Commanders Panel reviews a candidate for PMP.</li> </ul> <p>The PMP application is in the final stages of development and is being piloted in North Patrol before widespread usage in the Department.</p> <p>In addition, as noted in another section, Department leadership has been actively discussing the Law Enforcement Gang/Clique issue at stations, with sergeants and lieutenants in various stations in the Department.</p>
26.	9. The Sheriff should flatten the chain of command by eliminating at least one layer of supervision between him and the captains running patrol stations.	
		<ul style="list-style-type: none"> <li>The Department's decentralized station- based structure has played a significant role in fostering Deputy Gangs and Deputy Clique.</li> <li>Deputies' loyalties are extended to the station rather than to the institution of the Department as a whole.</li> <li>Some patrol station captains where these groups have flourished have found it easier to do nothing than take them on.</li> <li>The COC interviewed several captains of stations with widely known, active Deputy Gangs or Deputy Cliques who professed to</li> </ul> <p>The Department disagrees with this specific recommendation. The Sheriff is satisfied with the command structure of the organization, and that each level satisfies an important managerial purpose in a large complex organization.</p> <p>However, the Department appreciates the reasoning behind the recommendation and the importance of the Sheriff communicating directly with different managerial levels in the organization. As a result, the Sheriff regularly speaks to captains, and others in the Department, to directly share his message. In addition, the Department is reviewing other ways to achieve the objective of this recommendation.</p> <p>On February 4, 2025, the Sheriff held a meeting of all patrol captains, to ensure that he is communicating directly with</p>



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	<p>know nothing about them despite extensive media coverage of scandals and widespread awareness of deputies of their presence.</p> <ul style="list-style-type: none"> <li>• Because of the relative ease of the “do nothing” choice, information has not consistently flowed up to Commanders, Chiefs, and Assistant Sheriffs. That must change.</li> <li>• Shortening the chain of command will assist the Sheriff in seeing that his policies will be enforced.</li> <li>• Currently, there are six layers of reporting from a Captain of a Patrol Station to the Sheriff (Captain to a Commander to a Chief to an Assistant Sheriff to the Undersheriff to the Sheriff).</li> <li>• This top-heavy structure has led to a level of autonomy at certain patrol stations that has contributed to the continuation of these groups.</li> <li>• Some have equated patrol stations to functioning more like fiefdoms than integral parts of a command structure where policy is implemented throughout the Department.</li> <li>• This level of autonomy would be ameliorated by a shorter chain of command which the Sheriff could accomplish in a number of ways.</li> </ul>	<p>the Captains and to ensure that his message in addressing this issue is clear.</p>

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		<ul style="list-style-type: none"> <li>At a minimum, the Assistant Sheriff for Patrol Operations should be a direct report to the Sheriff.</li> </ul>	
27.	10. The prohibition against joining or participating in Deputy Gangs or Cliques should be a condition of employment.	Once the Sheriff adopts Recommendation No. 2, above, non-participation in Deputy Gangs or Deputy Cliques should be an express condition of employment. Such a condition will make clear from inception what will not be tolerated by the Department.	<p>In 2023, the Personnel Administration Bureau instituted a process where candidates for employment are advised of this condition. Candidates also were required to read and acknowledge the Department policy on this issue. The conditional offer of employment was updated on October 7, 2024, to incorporate the new policy.</p> <p>Specifically, the Conditional Offer of Employment requires candidates to agree and acknowledge that they will not “associate with, participate in, or join any Deputy gangs or cliques. Deputy gangs or cliques will not be tolerated by the Department and such association can be grounds for termination. Please review the following sections of the Manual of Policy and Procedures (MPP) carefully. It is crucial to read them thoroughly and ensure a complete understanding of the policies.”</p>