



# COUNTY OF LOS ANGELES SHERIFF CIVILIAN OVERSIGHT COMMISSION

*Improving Public Transparency and Accountability*

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April 17, 2025

TO: Supervisor Kathryn Barger, Chair  
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FROM: Sharmaine Moseley,  
Executive Director, Sheriff Civilian Oversight Commission

SUBJECT: **REPORT BACK ON LOS ANGELES COUNTY SHERIFF'S DEPARTMENT'S  
COMPLIANCE WITH THE PRISON RAPE ELIMINATION ACT (PREA)  
(ITEM NO. 10, AGENDA OF MARCH 19, 2024)**

This report is submitted in response to the Los Angeles County Board of Supervisors' (Board) motion<sup>1</sup> issued on March 19, 2024, instructing the Los Angeles County Sheriff Civilian Oversight Commission (Commission) to review the Los Angeles County Sheriff's Department's (LASD) efforts toward compliance with the Prison Rape Elimination Act (PREA) and provide recommendations and proposed next steps to ensure LASD's further compliance. The Commission has comprehensively reviewed the LASD's June 12, 2024, report<sup>2</sup> on its PREA compliance and the subsequent analysis and recommendations provided by the Los Angeles County Office of Inspector General (OIG).<sup>3</sup> This report builds on the OIG's findings, identifies gaps in LASD's PREA compliance, and offers actionable steps to ensure that LASD fully complies with PREA standards.

## SUMMARY OF LASD PREA COMPLIANCE EFFORTS & OFFICE OF INSPECTOR GENERAL REPORT FINDINGS

The LASD has taken essential steps to comply with PREA standards, as evidenced by several key initiatives and structural changes to enhance the safety and security of individuals within the County's custody facilities. These efforts are critical in fostering a zero-tolerance culture within LASD towards sexual abuse and harassment. The following summarizes LASD's primary initiatives:

<sup>1</sup> Los Angeles County Board of Supervisors. (2024). Agenda Item 10, March 19, 2024, Revised Motion Proclaiming April 2024 as Sexual Assault Awareness Month: Building Connected Communities and Prison Rape Elimination Compliance. Retrieved from <https://file.lacounty.gov/SDSInter/bos/supdocs/189655.pdf>

<sup>2</sup> [LASD PREA Compliance Status Report](#)

<sup>3</sup> [OIG Report Back on the Sheriff's Department's Compliance with PREA](#)

### **Facility Analysis**

LASD has taken proactive measures to inspect and evaluate its custody facilities and patrol station jails to ensure compliance with PREA standards. Regular inspections have been conducted to identify potential physical blind spots, assess privacy issues, and evaluate the adequacy of staffing plans. The Department's Office of PREA Compliance (OPC) partnered with the Department's Facilities Planning Bureau to facilitate the installation of 136 closed-circuit television cameras in the Department's inmate processing and housing areas. The installation of closed-circuit television (CCTV) cameras in high-risk areas has been a significant step forward, providing enhanced monitoring capabilities. However, ongoing facility assessments and improvements remain critical to addressing emerging challenges and maintaining compliance.

The OIG's report highlighted a disproportionately higher number of sexual abuse and sexual harassment allegations within the jail facilities. It was noted that there is a focus on station jail lockups, where detainees typically stay for 48-72 hours, compared to custody jail facilities, where many PREA-related alleged incidents occur. Between 2020 and 2024, there were 1,081 allegations of sexual abuse or harassment in jail facilities, compared to just 26 station jail lockups.<sup>4</sup> This disparity underscores the need for LASD to redirect its resources and attention to long-term custody jail facilities, where the risk and impact of sexual abuse and harassment are significantly higher.<sup>5</sup>

The OIG's inspections also revealed significant inconsistencies in the availability of PREA informational materials within custody facilities. In some cases, required PREA posters were either missing or did not meet PREA standards.<sup>6</sup> Additionally, PREA pamphlets and first responder cards were often unavailable to staff and incarcerated people. This lack of accessible information undermines efforts to educate incarcerated people and facility staff about their rights and responsibilities under PREA, potentially leading to underreporting and mishandling of incidents.

**Implications:** Failing to prioritize long-term custody jail facilities in PREA compliance efforts could lead to continued underreporting and mishandling of serious incidents, particularly in those facilities where alleged incidents are more likely to occur. Ensuring that PREA information is consistently available and accessible in all facilities is crucial for fostering an environment where sexual abuse and harassment are actively prevented and appropriately addressed. LASD must take immediate steps to standardize the distribution and posting of PREA materials to comply with federal standards.

### **Inadequate PREA Information and Resources in Facilities**

OIG facility spot-checks revealed significant inconsistencies in the availability of PREA informational materials within custody facilities. In some cases, required PREA posters were either missing or did not meet standards. Additionally, PREA pamphlets and first responder

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<sup>4</sup> [OIG Report Back on the Sheriff's Department's Compliance with PREA, page 4](#)

<sup>5</sup> [OIG Report Back on the Sheriff's Department's Compliance with PREA, page 5](#)

<sup>6</sup> For example, several of the PREA posters at custody jail facilities did not state that victims may report staff neglect or violation of responsibilities that may have contributed to sexual abuse or sexual harassment pursuant to PREA Standard 115.51.

cards were often unavailable to staff and incarcerated people. This lack of accessible information undermines efforts to educate incarcerated people and staff about their rights and responsibilities under PREA, potentially leading to underreporting and mishandling of incidents.

**Implications:** Ensuring that PREA informational materials are consistently available and accessible in all facilities is crucial for fostering an environment where sexual abuse and harassment are actively prevented and appropriately addressed. LASD must take immediate steps to standardize the distribution and posting of PREA materials to comply with federal standards.

### **Training Initiatives**

[PREA training](#) has been a central component of LASD's compliance strategy. The LASD has implemented comprehensive training programs for all staff, volunteers, and contractors who interact with those incarcerated. Newly hired deputies and custody assistants receive three hours of PREA training as part of the LASD's AJail Operations Training.<sup>7</sup> This training covers the key elements of PREA standards, reporting mechanisms, and the Department's zero-tolerance policy. Specialized training modules have been developed for investigators and medical personnel, ensuring they possess the skills needed to handle sensitive cases of sexual abuse and harassment.<sup>8</sup> Despite these efforts, gaps in training persist, particularly among new hires and transitory staff, necessitating continuous and rigorous training efforts.

The OIG found that many of the LASD personnel responsible for investigating PREA allegations have not received the specialized training required by PREA standards. The Sheriff's Department acknowledged that some personnel involved in PREA investigations had not received the specialized training required under PREA standards.<sup>9</sup> This training is essential for ensuring that investigations are conducted thoroughly, objectively, and with the necessary sensitivity to the complexities of sexual abuse cases. The absence of such training raises concerns about the credibility and effectiveness of investigations, which could lead to justice being denied to victims.

**Implications:** Inadequate investigator training could result in flawed investigations, leading to unsubstantiated or unfounded investigation outcomes that may discourage future reporting. It should be noted that not a single allegation of staff on incarcerated person harassment or abuse was substantiated, per the LASD's report.<sup>10</sup> Therefore, LASD must prioritize developing and implementing ongoing specialized training programs for all personnel involved in PREA investigations to enhance the integrity of these investigations. In addition, LASD should develop a PREA-specific interview guide to investigate complaints of sexual abuse/harassment.

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<sup>7</sup> LASD. (2024). Prison Rape Elimination Act (PREA) Compliance Status in the LASD Jails Report back to the Board. Retrieved from <https://file.lacounty.gov/SDSInter/bos/supdocs/189768.pdf>

<sup>8</sup> LASD. (2018). Custody Division Manual 3-04/025.50-PREA Employee Training. Retrieved from <https://pars.lasd.org/Viewer/Manuals/12682/Content/12841?showHistorical=True>

<sup>9</sup> [OIG Report Back on the Sheriff's Department's Compliance with PREA, page 7](#)

<sup>10</sup> [LASD PREA Compliance Status Report, page 5](#)

### **Data Collection and Management**

The establishment of a PREA Allegation Alert Database has been a critical development in tracking and managing allegations of sexual abuse and harassment within LASD facilities. This database allows for real-time monitoring of cases, enabling leadership to identify trends and respond swiftly to emerging issues. Quarterly data summaries are published on the LASD's Transparency Web page,<sup>11</sup> contributing to greater accountability and transparency. However, the accuracy, completeness, and timeliness of data reporting need further improvements to ensure that all stakeholders have access to up-to-date and actionable information.<sup>12</sup>

The OIG found that the LASD should improve the transparency and accuracy of PREA-related data by regularly updating and publishing the outcomes of investigations into sexual abuse and harassment allegations.<sup>13</sup> Data should be published promptly and include detailed information about the status and resolution of cases.

**Implications:** The lack of timely and accurate updates in the PREA Allegation Alert Database weakens LASD's accountability and transparency efforts. While the database is crucial for tracking cases, delayed reporting and incomplete data undermines trust in the investigation process and may discourage future reporting of sexual abuse incidents. The OIG found that many allegations remain unresolved in quarterly reports, raising concerns about the thoroughness of investigations. Timely and detailed updates, both in quarterly summaries and the database, are essential for improving investigative integrity and fostering accountability within LASD.

### **Audit and Compliance Efforts**

The Prison Rape Elimination Act (PREA)<sup>14</sup> mandates that correctional facilities implement measures to prevent, detect, and respond to sexual abuse and harassment. Compliance with PREA involves adhering to key standards, such as maintaining a zero-tolerance policy toward sexual abuse (Standard 115.11).<sup>15</sup> These standards are crucial for fostering a safe and accountable environment within LASD facilities. The LASD has initiated audits of its facilities to assess compliance with PREA standards, beginning with patrol station jails. These audits have identified areas of non-compliance, prompting the implementation of corrective actions. The LASD has committed to ongoing audits, focusing on institutionalizing the necessary policy and procedural changes to ensure long-term compliance. The OIG's role as a certified PREA auditing body has provided oversight and guidance to LASD through the audit process. Nevertheless, the LASD faces challenges meeting all PREA standards, particularly in more complex and high-risk custody jail facilities.

The OIG's 2023 audits of station jail lockups revealed significant non-compliance with PREA standards.<sup>16</sup> For instance, the audit at Lakewood Station found that only 8 of the 35 required

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<sup>11</sup> [LASD Transparency Webpage](#)

<sup>12</sup> [OIG Report Back on the Sheriff's Department's Compliance with PREA, page 11](#)

<sup>13</sup> [OIG Report Back on the Sheriff's Department Compliance with PREA, page 4](#)

<sup>14</sup> [3-04/025.00 Prison Rape Elimination Act of 2003 \(PREA\)-Background and Definitions](#)

<sup>15</sup> [PREA Resource Center, Standard 115.11 Zero tolerance of sexual abuse and sexual harassment](#)

<sup>16</sup> [OIG Report Back on the Sheriff's Department's Compliance with PREA, page 2](#)

PREA standards were met, indicating a substantial gap in compliance. Similar issues were observed at Marina del Rey, Lomita, and East Los Angeles stations. The OIG noted that many non-compliant areas are linked to outdated or incomplete policies and procedures and inadequate staff training.<sup>17</sup> The failure to institutionalize corrective actions promptly could lead to recurring issues and jeopardize LASD's overall PREA compliance efforts.

**Implications:** Without addressing these compliance gaps, LASD risks failing future audits and compromising the safety and security of individuals in its custody. LASD must prioritize timely implementation of corrective actions, mainly policy updates and staff training, to prevent further non-compliance and enhance its audit readiness.

### **PREA Coordinator Authority**

The limited authority and organizational placement of the LASD's PREA Coordinator (Coordinator) hinder the effectiveness of LASD's PREA compliance efforts. The OIG recommended that the Coordinator be elevated to report directly to an upper-level executive. This would ensure that the Coordinator has the authority to enforce PREA standards across all operations. Currently, the Coordinator reports to a lower-level command within Custody Services Division Specialized Programs, limiting the Coordinator's influence over broader departmental policies and practices.

**Implications:** The current organizational structure dilutes the effectiveness of the PREA Coordinator's role, leading to potential inconsistencies in policy enforcement and oversight. By elevating this position, LASD can ensure more robust and coordinated PREA compliance efforts across all divisions.

## **RECOMMENDATIONS**

After reviewing and analyzing the LASD's report back to the Board on the status of LASD's PREA compliance and the OIG's review of the LASD's reports, the Commission has developed the following recommendations, which are essential for LASD achieving and sustaining PREA compliance. To ensure greater LASD compliance with PREA standards, the Commission recommends that:

### **The Board request the LASD:**

1. Provide a written report to the Board, the Commission, and the OIG within 60 days with the LASD's positions on each recommendation issued by the Commission and the OIG according to the Board's motion.
2. Provide a written report back to the Board, the Commission, and the OIG within 60 days with:
  - a. An itemized status for the completion of all corrective actions identified during the OIG's 2023 station jail lockup audits and a brief description as to when each

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<sup>17</sup> [OIG Report Back on the Sheriff's Department's Compliance with PREA, page 3](#)

corrective action is expected for those that have not been resolved and the obstacles to implementation, if any, of the OIG's corrective actions.

3. Provide a written report back to the Board, the Commission, and the OIG within 90 days with a timeline and identify a department contact for:
  - a. Prioritizing PREA compliance efforts including, but not limited to:
    - i. Audits in the custody facilities.
    - ii. Development of a PREA Interview Guide to be used to investigate complaints of sexual abuse/harassment.
  - b. Fully implementing the PREA Risk Assessment Classification Tool.
  - c. Restructuring the reporting chain of command so that the PREA Coordinator reports directly to an upper-level executive, such as the Assistant Sheriff, and is granted authority over all LASD operations that require PREA compliance.
  - d. Developing and implementing a plan for standardized distribution and posting of PREA informational materials across all custody facilities, including posters, pamphlets, and first responder cards.
  - e. Development and implementation of specialized ongoing training programs for all personnel involved in investigating sexual abuse and harassment allegations.
  - f. Improving the accuracy of PREA reports by adding section(s) with:
    - i. Updates and outcomes on previously pending sexual abuse and harassment allegations investigations.
    - ii. Number of incarcerated persons escorted for forensic medical exams to Los Angeles County Designated Sexual Assault Response Team (SART)
    - iii. Number of written complaint outcomes provided to incarcerated people for inmate-on-inmate sexual abuse allegations with the result of the investigation.
    - iv. The number of grievance printouts provided to incarcerated people notifying them in writing of the outcome of grievances for staff-on-incarcerated person sexual abuse and sexual harassment allegations.
    - v. Data breakdown by facility count of the number of allegations of sexual abuse and sexual harassment.
    - vi. Uploading copies of the following LASD PREA training videos to the LASD public website page on Custody PREA for transparency and public access in both English/Spanish:
      1. Sworn and Civilian Staff Videos
        - a. Sergeant PREA Allegations Alert Training
        - b. Contractors and Volunteers Training
        - c. Sworn and Civilian Staff Training
      2. Inmate PREA Videos
        - a. Responsibilities
        - b. Support Services
        - c. Reporting
  - g. Develop a plan for achieving and maintaining PREA standard compliance across all LASD facilities.

**The Commission further requests that the Board consider:**

1. Examining the feasibility of allocating the following resources to LASD for PREA-related services:
  - a. Allocate \$125,000 to reinstate the Peace Over Violence (POV) hotline, providing incarcerated people with access to sexual trauma support counselors.
  - b. Allocate \$260,500 for live scanning of the 3,659 LASD employees hired before January 1, 2001, to meet PREA Standard 115.17.

**CONCLUSION**

LASD has made important strides toward PREA compliance, but challenges remain that require focused attention, resources, and a commitment to continuous improvement. The recommendations provided by the Commission, informed by the OIG's thorough review, are designed to address these challenges and support the LASD in achieving full and sustained compliance with PREA standards. The success of LASD's PREA compliance efforts will have far-reaching implications for the Department and the residents of Los Angeles County. The commitment to preventing, detecting, and responding to sexual abuse and harassment within detention facilities is a moral and legal obligation—one that requires the full engagement and cooperation of all stakeholders involved. As such, the Commission urges the Board to endorse these recommendations to ensure the safety and well-being of all individuals in the County's custody.

SM: tj

c: Robert G. Luna, Sheriff  
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