

## Report Card: Status of COC's 27 Recommendations to eliminate deputy gangs and deputy cliques (Updated: October 20, 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 4, 2023, 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 <sup>1</sup>
<b>1. The Sheriff must clearly state his vision of deputy gangs/cliques.</b>	Rec. A-1	Partially Implemented	The Sheriff's has articulated a vision in communications and leadership sessions but has failed to include a clear vision of ridding the LASD of deputy cliques.	
<b>2. Adopt a policy prohibiting participation in deputy gangs as defined in Penal Code section 13670.</b>	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 on September 18, 2024, effective in 30 days.	

<sup>1</sup> 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.

<b>3. Adopt a policy prohibiting joining or participating in deputy cliques.</b>	Rec. A-3	Not Implemented	COC's policy recommendation banning deputy cliques is subject to a continuing Meet & Confer process with ALADS and PPOA.	
<b>4. Develop a department-wide initiative to eliminate deputy gangs/cliques.</b>	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.	
<b>5. Engage labor unions (ALADS, PPOA) to support policies on deputy gangs/cliques.</b>	Rec. A-5	Fully Implemented	The Sheriff and his representatives have met with union leaders at length to discuss the COC's Recommendations that County Counsel opined required a meet & confer.	
<b>6. Ensure that captains and senior executives support and implement the Sheriff's vision on gangs/cliques.</b>	Rec. A-6	Fully Implemented?	We are advised that Executive leadership training and oversight structures are in place, and that prior deputy clique membership is discussed before promotions to senior ranks.	
<b>7. Assign two Captains to 6 patrol stations with a history of active deputy cliques, such as the Banditos, Executioners, Cowboys, Regulators and Reapers.</b>	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.	

<b>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.</b>	Rec. B-1	Not Implemented	This Recommendation cannot be fully implemented until there is a policy banning deputy cliques. The ban of clique-related tattoos is subject to meet and confer process.	
<b>9. Investigate violations of policies banning participating in deputy gangs and deputy cliques and refer violations for disciplinary action.</b>	Rec. B-2	Not Implemented	No investigations of deputy law enforcement gangs or deputy cliques have been possible and no discipline imposable, because until September 2024 there was no policy prohibiting either. After 30 days, the LASD internal affairs will be able to investigation participating in law enforcement deputy gangs, but not participation in deputy cliques, as there is no policy that prohibits participation in unauthorized and exclusionary subgroups that typically have matching tattoos with offensive iconography.	
<b>10. Department Leadership should emphasis the adverse career consequences of joining deputy cliques or deputy gangs.</b>	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 clique is still not prohibited by policy, which undermines this messaging.	
<b>11. Notify the District Attorney's Office when a deputy involved in a case is linked to gangs/cliques.</b>	Rec. B-4	Not Implemented	We are informed by the Department that its internal notification process is being updated to comply with Brady's	

			obligations. We are unable to confirm that this would assure notifications if a testifying deputy has been identified as member of a deputy gang/cliue.	
<b>12. Actively investigate violation of policy banning participation in deputy gangs and deputy cliques</b>	Rec. B-5	Not Implemented	No such investigations have taken place as there has been no policy prohibiting participation in deputy gangs or deputy cliques. See Rec. 9, above.	
<b>13. Train supervisors to mentor deputies on the dangers of deputy gangs/cliues.</b>	Rec. B-6	Being 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.	
<b>14. Hold community meetings to ascertain the impact of deputy gangs/cliues on the public and public trust in the Department.</b>	Rec. B-7	Being Implemented	The first round of community meeting was completed with DOJ-CRS facilitation, and the second round started in March 2024.	
<b>15. Rotate deputies to prevent the formation of deputy gangs/cliues.</b>	Rec. C-1	Not Implemented	The Department has indicated that contract cities are concerned regarding the impact of impact of involuntary rotation of deputy gang/cliue 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 reconsidered. If, after a year, the Sheriff can assure the COC that deputy cliques no longer exist, 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.
<b>16. Assess dual career track for Custody/Court services and provide report back</b>	Rec. C-2	Not Implemented	The Department has informed us that it has no current plan to institute a dual track model.	Rejected.
<b>17. Assess the feasibility of not requiring the first assignment of a new deputy to Custody</b>	Rec. C-3	Not implemented	The Department advises that they have assessed and deemed moving away from a Custody as the first assignment as unnecessary due to sufficient deputies in the patrol transfer lists. We are awaiting a report from the Department on this.	Rejected. This should be reconsidered. There is an issue regarding whether Custody should be a first assignment for deputies who desire to do policing work. 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.
<b>18. Ensure senior executives, Captains and above, are implementing the Sheriff's policy, vision and goals regarding Deputy Gangs/Cliques</b>	Rec. D-1	Partially Implemented	Based on our discussion with Department leadership, we believe that the Sheriff is doing this regarding "law enforcement gangs." It is unclear whether the Sheriff's vision and goals	

			include prohibiting deputy participation in Deputy Cliques and exclusionary subgroups.	
<b>19. The OIG should monitor implementation of the COC's recommended policies banning participation in deputy Gangs and deputy cliques.</b>	Rec. D-2	Not Implemented by OIG	Until September 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.	
<b>20. Consider present and former deputy gang/cliue involvement in making promotions</b>	Rec. D-3	Fully Implemented	We are informed that promotion interviews for senior roles include questions on deputy gang affiliations and that this factor is considered. Former participation is not disqualifying, provided the applicant for promotion genuinely supports the Sheriff's policies and vision to rid the Department of deputy gangs/cliues.	
<b>21. Develop a standard set of questions regarding a deputy's current affiliations within force reviews and internal investigations</b>	Rec. D-4	Not implemented	No reason for not implemented this has been provided to the Commission, but it does not appear to have been implemented.	
<b>22. Ensure captains are notified of deputies involved in force incidents have deputy gang/cliue affiliations.</b>	Rec. D-5	Partially Implemented	We are advised by the Department that Captains are to be notified through updated policies. It is unclear whether these policies have been put in place, and the Commission has yet to see these updated policies.	

<b>23. Implement the Comp/Stat (SCIF) process to risk management for indicators of deputy gangs/cliques within patrol stations.</b>	Rec. D-6	Partially Implemented (?)	We are advised that there is an integration at crime and risk management meetings that include gang/clique indicators. The Commission's Ad Hoc Committee on Deputy 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.	
<b>24. Ensure that captains hold lieutenants and sergeants accountable for deputies under their supervision that are involved in deputy gangs/cliques.</b>	Rec. D-7	Not implemented	Captains cannot hold subordinates responsible until there are clear policies banning participation by deputies in deputy gangs and deputy cliques. Starting in October 2024, this is possible regarding deputy or law enforcement gangs, but not as to Deputy Cliques as there is no policy banning participation in Deputy Cliques.	
<b>25. Ensure that sergeants actively and recurrently mentor deputies regarding policies prohibiting joining and participating in deputy gangs and deputy cliques.</b>	Rec.D-8	Not implemented	Until September, LASD policy prohibited neither.	
<b>26. Flatten the chain of command for better oversight.</b>	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	Rejected. This should be reconsidered. The degree of autonomy of patrol stations captains has led to hiding the ball and a head-in-the-

			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.	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.
<b>27. Make prohibition on joining deputy gangs/cliques a condition of employment.</b>	Rec. D-10	Fully Implemented	New hires are required to sign acknowledgments of the prohibition	

Totals:

5 Recommendations *Fully Implemented*

8 Recommendations *Partially Implemented*

14 Recommendations *Not Implemented* (four which have been rejected)