

Report Card: Status of COC's 27 Recommendations to eliminate deputy gangs and deputy cliques (Updated: April 11, 2025)

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 includes color coding to indicate the Commission's determination that the LASD has *Fully Implemented*, *Partially Implemented* or *Not Implemented* a particular Recommendation. The color coding is as follows:

Green – represents those recommendations the Commission determines that the LASD has completed or significantly implemented;

Yellow – represents those recommendations the Commission determines that the LASD has partially implemented;

Red – represents those recommendations the Commission determines that the LASD has not implemented;

Gray – represents a recommendation not directed at the LASD

Orange – represents those recommendations rejected by the Sheriff

In the chart below, the recommendations contain a statement regarding their status as of April 11, 2025¹ with brief comments, where appropriate.

¹ The LASD's assessment of progress in implementing the Commission's 27 Recommendations contained in its February 4, 2025 written assessment, as updated verbally by Sheriff Luna at the Commission's March 20, 2025 hearing, has been considered in this update and incorporated, where appropriate.

COC Recommendation	Sp Counsel Rpt. (Cross-Reference)	Status	Comments re Status	COC Comments on LASD's Assessment ²
1. The Sheriff must clearly state his vision of deputy gangs/cliques.	Rec. A-1	Partially Implemented	The Sheriff 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 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	The LASD's proposed policy for banning deputy cliques is subject to a continuing Meet & Confer process with ALADS and PPOA that has been ongoing for over two year.s	
4. Develop a department-wide initiative to eliminate deputy gangs and deputy cliques.	Rec. A-4	Partially 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	

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.

			Department-wide initiative to rid the LASD of deputy gangs and cliques. No policy has been adopted to date banning participation in deputy 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. The Commission is troubled that the meet and confer for COC's recommendation 3, above, has been ongoing since 2023, with no seeming end in sight.	
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 on 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 as there is not yet a Department policy prohibiting deputy cliques. We are advised that executive leadership training and oversight structures are in place, and prior deputy clique membership is	

			discussed before promotions to senior ranks, however.	
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 three of the six problematic patrol stations, for which the Board of Supervisors provided funding. The Commission understands that this recommendation has not been fully implemented owing to budgetary issues. The LASD has advised that, to date, the Board of Supervisors has not provided the funding to allow the Sheriff to place two Captains at three of the six problematic patrol stations. The COC supports funding for the additional three Captain positions and notes that such positions are temporary until the six stations are rid of the identified deputy cliques.	
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 Implemented	This Recommendation cannot be fully implemented until there is a policy banning deputy cliques. The ban on clique-related tattoos is also subject to meet and confer process, as is when and what type of authorized "station" logos are appropriate. These issues have been in meet and confer for the last two years.	
9. Investigate violations of policies banning participating	Rec. B-2	Partially Implemented	Until October 2024, no investigations of deputy law enforcement gangs	

in deputy gangs and deputy cliques and refer violations for disciplinary action.			have been possible and no discipline imposable, because there was no policy prohibiting deputy gangs. The Department has advised that it has and is investigating alleged violations of the policy prohibiting participation in law enforcement deputy gangs. There is still no department policy prohibiting participation in deputy cliques. 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. NOTE: At its March 20, 2025 monthly meeting, the Commission unanimously voted to recommend that the Sheriff immediately ban the Fort Apache logo and other offensive "station" logos and symbols.	
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 in Department and its image. However, joining a deputy clique is still not prohibited by Department 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 <i>Brady</i> obligations. It does not appear, however, that this would assure notifications if a testifying deputy has been identified as a member of a deputy clique. Per the Department, if there is a sustained finding, after an 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 violations of policy banning participation in deputy gangs and deputy cliques	Rec. B-5	Partially Implemented	The Department advises that it is investigating alleged violations 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. MPP section 3-01/050.83, eff. February 2020, does not ban participation in Deputy Cliques.	
13. Train supervisors to mentor deputies on the dangers of deputy gangs/cliques.	Rec. B-6	Paritally 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 public and public trust in the Department.	Rec. B-7	Fully Implemented	The first and second rounds of community dialogues were completed with USDOJ Community Relations Service facilitation and is completed. CACs 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	At this moment, the Sheriff is not inclined to adopt and implement this recommendation. The Sheriff shared at the Commission's March 20, 2025 monthly meeting that he is not inclined to adopt these recommendations because, "[he] do[es] not believe that transferring people as a means to solve a personal problem is appropriate [and] community policing principles suggest staying and knowing your	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

			communities is critically important to effective policing.”	clique members assigned to them rotated out, 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 past experience and will keep the COC advised. From the COC’s perspective, this recommendation is part of a broader issue regarding optimal jail staffing, which includes making Patrol a deputy’s 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 be to Custody	Rec. C-3	Not implemented	After initially rejecting this Recommendation, the Sheriff told the Commission at its March 20, 2025 that his team is evaluating the feasibility of this recommendation.	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 practices in staffing for the Jails. It is not necessary to have 2/3rds of the jail guards in Custody Division 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 implementing this policy regarding "law enforcement gangs." Still, a policy prohibiting membership in deputy cliques has not yet been adopted by the Department.	
19. The OIG should monitor implementation of the COC's recommended policies banning participation in deputy Gangs and deputy cliques.	Rec. D-2	Partially being implemented, but not applicable to LASD. It is unclear whether the OIG is monitoring internal investigations of violations of policy prohibiting law	Until October 2024, there were no policy prohibiting deputy participation in deputy gangs or 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.	The OIG is agreeable to monitoring implementation of the anti-deputy gang policy and will report back to the COC.

		enformcenet gangs, open or closed.		
20. Consider present and former deputy gang/cliue involvment 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. 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. Promotions below Captain are subject to the civil service examination process. Per the LASD, only sustained discipline for violations of LASD policy can be considered regarding these promotions. Accordingly, former participation in deputy gangs is not a factor, unless such participation continued after October 2024. There is still no Department policy prohibiting participation in deputy cliques.	
21. Develop a standard set of questions regarding a deputy's current affiliations within force reviews and internal investigations	Rec. D-4	Partially implemented	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.	

22. Ensure captains are notified of deputies involved in force incidents have deputy gang/cliue affiliations.	Rec. D-5	Fully Implemented	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 cliue during the course of an investigation, the repsective captains ... are notified by PSD command staff.” Commission has yet to see these updated policies.	
23. Implement the Comp/Stat (SCIF) process to identify indicators of deputy gangs/cliues 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/cliue 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 Cliue 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	Rec. D-7	Partially implemented	Captains cannot hold suborndiates accountable for LASD personnel that are member of deputy cliques until there are clear policies banning participation by deputies in deputy	

are involved in deputy gangs/cliques.			cliques. Currently, such participation does not violate LASD policy. Starting in October 2024, this is now possible regarding a deputy's involvement with deputy/ law enforcement gangs.	
25. Ensure that sergeants actively and recurrently mentor deputies regarding policies prohibiting joining and participating in deputy gangs and deputy cliques.	Rec. D-8	Partially implemented	Until October 2024, LASD policy prohibited neither. We are informed that the Department is overhauling its 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.	The Sheriff notified the Commission at its March 20, 2025 meeting that he will not implement this recommendation at this point.	Rejected. This should be reconsidered. The degree of autonomy of patrol station 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. There should be a study on how the current organization structure potentially adversely affects

				management efficiency and policy compliance.
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	

Totals:

4 Recommendations *Fully Implemented*

16 Recommendations *Partially Implemented*

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

1 Recommendation directed at the Office of the Inspector General

2 Recommendations Rejected by Sheriff