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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

11
12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 THE COUNTY OF LOS ANGELES
16 AND THE LOS ANGELES COUNTY
SHERIFF'S DEPARTMENT,

17 Defendants.
18

CASE NO. 2:15-CV-03174-JFW-FFM

**SUBMISSION OF MONITORS'
INITIAL SIX MONTH REPORT**

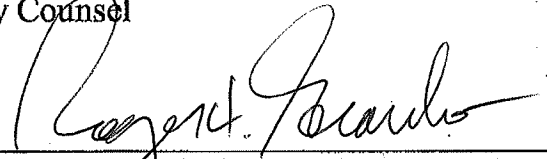
19 On May 1, 2015, the Court approved and entered the parties' Settlement
20 Agreement ("Agreement") to resolve the United States' claims against the County of
21 Los Angeles and the Los Angeles County Sheriff's Department pursuant to
22 42 U.S.C. 14141 and the Fair Housing Act, 42 U.S.C. 3601 *et seq.*

23 Paragraph 171 of the Agreement requires the Monitors to publically issue a
24 report every six months that details the Parties' progress in implementing the
25 Agreement and achieving compliance with the Agreement. The initial six month
26 report was originally due on November 2, 2015, but that date was extended by
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1 stipulation and Court order to December 22, 2015. The parties hereby submit the
2 Monitors' initial six month report.

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4 DATED: 12-22-15

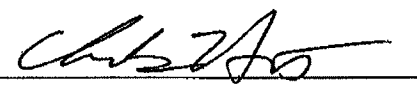
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11 DATED: 12/22/15

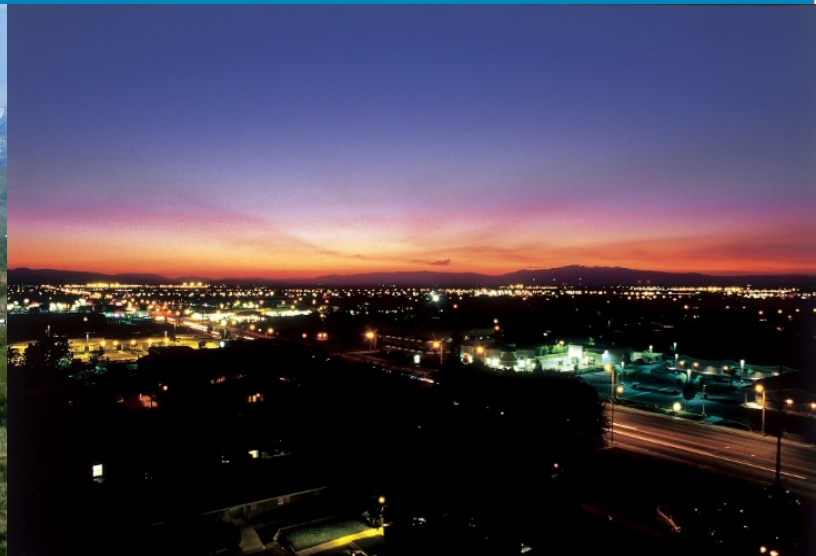
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ATTACHMENT

Los Angeles County Sheriff's Department Antelope Valley Evaluation Monitoring Team



**Six-Month Report
December 22, 2015**

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I. INTRODUCTION

As per paragraph 171 of the Settlement Agreement between the Parties, the Monitoring Team submits this initial semiannual report, dated December 22, 2015.

In August 2011, the US Department of Justice (DOJ), Civil Rights Division, launched an investigation of the Los Angeles County Sheriff's Department (LASD) in response to complaints and allegations of violations of the Fair Housing Act in the Antelope Valley, California. Upon completion of their investigation in June 2013, the DOJ issued a letter documenting their findings that the LASD's Lancaster and Palmdale Stations had engaged in a pattern and practice of conducting stops, searches, and seizures that were unreasonable and in violation of the Constitution and federal law. Additionally, the DOJ concluded there was evidence of discrimination against African Americans in the enforcement of the Housing Choice Voucher Program (commonly known as Section 8), which is a violation of the Fair Housing Act.

The LASD and DOJ subsequently entered into negotiations regarding appropriate remedies, and the parties developed the Settlement Agreement (SA), which was ultimately signed and filed with the US District Court for the Central District of California in April 2015. The purpose of the SA is to ensure that the residents of the Antelope Valley are provided with police services that are lawful and fully consistent with the Constitution of the United States and contemporary policing practices.

The SA specifically identifies a variety of reforms and objectives to be met by LASD in the Antelope Valley, which are briefly summarized below.¹

1. Stops, seizures, and searches. LASD agrees to ensure that all investigatory stops, seizures, and searches are conducted in accordance with the Constitution or laws of the United States. Investigatory stops shall be part of an overall crime prevention strategy and will not contribute to counterproductive divisions between LASD and the community. All investigatory stops will be adequately documented for tracking for supervision purposes.
2. Bias-free policing. LASD shall deliver police services that are equitable, respectful, and bias-free and in a manner that promotes broad community engagement and confidence in the department. LASD will continue to conduct regular training for deputies, supervisors, and command staff regarding discriminatory policing.
3. Enforcement of Section 8 compliance. LASD agrees not to violate the Fair Housing Act by (a) making unavailable or denying a dwelling unit to any person because of race; (b) discriminating against any person in terms, conditions, or privileges of renting a dwelling unit, or in the provision of services or facilities in connection therewith, because of race; (c) making, printing, publishing, or causing to be made, printed, or published any notice, statement, or advertisement with respect to the rental of a dwelling unit that states any preference, limitation, or discrimination based on race; or (d) coercing, intimidating, threatening, or interfering with any person in the exercise or enjoyment of any right granted by the Fair Housing Act. LASD shall document, report, and analyze all incidents involving voucher holders.

¹ The complete SA is available at http://www.justice.gov/sites/default/files/crt/legacy/2015/04/29/antelope_agreement_4-28-15.pdf

4. Data collection and analysis. LASD agrees to enhance its data collection, analysis, and reporting. LASD will develop and implement a protocol for the collection and regular analysis of data to assess whether there are trends and patterns that indicate bias or practices that would otherwise run counter to constitutional and effective policing.
5. Community engagement. LASD agrees to promote and strengthen partnerships within the community, to engage constructively with the community to ensure collaborative problem solving and bias-free policing, and to increase community confidence in LASD.
6. Use of force. LASD agrees to revise its force policies and practices to reflect its commitment to upholding the rights secured or protected by the Constitution in regard to protecting human life and the dignity of every individual, and maintaining public safety. LASD agrees to ensure that its accountability measures are implemented appropriately so that Antelope Valley deputies (1) use force only when objectively reasonable and in a manner that avoids unnecessary injury to deputies and civilians, and (2) use force as a last resort and de-escalate the use of force at the earliest possible moment. Deputies and staff shall endeavor to use only that level of force necessary for the situation. LASD will continue to require deputies to report and document all uses of force completely and accurately. All uses of force shall be investigated thoroughly by supervisors, and LASD will hold deputies accountable for uses of force that violate policy or law. LASD shall provide all Antelope Valley deputies with annual or biennial use of force training. LASD will analyze and report the Antelope Valley stations' force data, including the force-related outcome data, to identify significant trends and to identify and correct deficiencies revealed by analysis.
7. Personnel complaint review. LASD will ensure that all allegations of personnel misconduct are received and are fully and fairly investigated, and that all personnel who commit misconduct are held accountable pursuant to a disciplinary system that is fair and consistent. LASD agrees to provide updated and revised training to the Antelope Valley deputies and supervisors about proper complaint intake, classification, and investigative techniques. LASD shall conduct semiannual audits of the Antelope Valley stations' complaint intake, classification, and investigations.
8. Accountability. LASD will strengthen its accountability mechanisms to provide personnel with the support, mentoring, and direction necessary to consistently police constitutionality. LASD will continue to implement and modify the Personnel Performance Index (PPI) system and will develop a plan to periodically review how the Antelope Valley stations analyze the PPI to respond to concerns unique to their stations.

The SA also stipulates that a professional monitor be selected to track and assess the LASD's progress in implementing and achieving compliance with the SA, work with the Parties to address obstacles to achieving compliance, and to report on the status of implementation to the Parties and the Court.

The Monitoring Team wants to acknowledge and thank the Parties to the SA for the patience and diligence they have displayed and the assistance provided to date in the initial phase of launching this important endeavor. The LASD, and particularly the staff of the Compliance Coordinator's Unit, have been especially helpful to the Monitoring Team during this critical stage of the work. The LASD has

been very mindful of and attentive to the importance of establishing a productive working relationship with the Monitoring Team and to submitting documents and materials in a timely fashion, such as policy revisions and unit orders, documentation of community engagement activities, and progress updates on the development and implementation of training curricula.

Over the last six months, the Monitoring Team has endeavored to begin familiarizing its members with the Antelope Valley and its unique characteristics and to establish an effective working relationship with the LASD, the Office of the Los Angeles County Counsel, and the DOJ. In the course of its work, the Monitoring Team has met with many members of the LASD, including Sheriff Jim McDonnell, Chief Jacques "Anthony" La Berge, Commander Mike Parker, Palmdale Station's Captain Don Ford, and Lancaster Station's Captain Patrick A. Nelson, among others.

The Monitoring Team is routinely meeting and working with the LASD Compliance Coordinator's Unit, which was established by the sheriff and funded by the Board of Supervisors, to initiate and coordinate the more than 150 reforms being undertaken in the Antelope Valley. In some cases, this has implications for department-wide policies. That unit is commanded by Lieutenant Eric Lasko, who is assisted by Sergeant Dan Stanley; Deputy Charity Brown; and Jasmine Khojasteh, a non-sworn professional staff member. The Monitoring Team has also toured the stations in Lancaster and Palmdale, met with station personnel, and conducted "ride-alongs" for the purpose of familiarizing Monitoring Team members with the community composition and significant features of the Antelope Valley. The LASD has also been working with the Monitoring Team to provide working space adjacent to the facility where the compliance team is located.

The Monitoring Team has held preliminary meetings with a variety of community representatives from the Antelope Valley, participated in a large community forum, attended Community Advisory Committee (CAC) meetings both in Lancaster and in Palmdale and met separately with members of Antelope Valley's African American and Latino communities.

It is important to note that the framework and approach being employed by the Monitoring Team to ensure that all requirements of the SA are met is predicated on the Parties subscribing to a collaborative reform model in carrying out this work. This approach is intended to not only foster greater collaboration among the Parties to the SA but also to promote increased trust and cooperation between the LASD and the various communities and constituencies it serves. A primary objective is to identify and directly address those issues that affect public trust and promote efforts to improve performance and mutual accountability among all the stakeholders. This approach, in which improved communication and transparency are paramount, helps facilitate permanent organizational and cultural change and ensure a sustained commitment on the part of all Parties to incorporating best practices in policing.² Apropos of this approach, in addition to some of the early work that is underway in relation to certain policy and unit order revisions, the Monitoring Team has noted a positive atmosphere and constructive communications, which are crucial to establishing a successful monitoring process. This has been particularly helpful and encouraging in the early stages of this work.

The remainder of this initial report will provide an update on LASD compliance activities to date, Monitoring Team activities and observations, a sense of the general progress being made towards fulfilling the requirements of the SA, and outlining future activities.

² Community-Oriented Policing Services, US Department of Justice. (2015). *Collaborative Reform Initiative for Technical Assistance: Fact sheet*. Washington, DC: Author. Retrieved from <http://www.justice.gov/file/cri-fact-sheet/download>

It should be noted that there is relatively little progress to report at this time in relation to meeting major implementation milestones or assessing significant outcomes. This is not due to any lack of readiness or effort on the part of LASD. Rather, it is tied more to the need during the initial phase of this work to establish systems and protocols to guide the work of the Monitoring Team, and to several significant changes which occurred late in this reporting period related to the composition both of the Monitoring Team and of project administration. In October, one of the three Monitors named in the SA withdrew from the Monitoring Team, and the administrative responsibilities for the project shifted to the National Council on Crime and Delinquency (NCCD).³ The remaining Monitors, Joseph Brann and Dr. Angie Wolf, have subsequently worked with the Parties to reconfigure the Monitoring Team. There appears to be agreement among the Parties and the Monitoring Team that it is now better positioned to undertake its full range of responsibilities, and the team expects to make significant progress in the coming months toward meeting the timelines established in the SA. Therefore, the next semiannual report will reflect a fully staffed Monitoring Team and will provide more detailed information regarding major monitoring activities and outcomes.

II. WORK TO DATE

The following areas of progress since the establishment of the Settlement Agreement will be described in this section.

- A. Monitoring Work Plan
- B. Policy Revision and Updates
- C. Community Engagement Activities
- D. Training Curricula Development and Implementation
- E. Data Systems

A. Monitoring Work Plan

Following the change in project administration and the withdrawal of the monitor associated with the original administrative organization, the processes for building the Monitoring Team and for developing the monitoring work plan essentially began anew. However, substantial progress has already been made in reconstituting the team and bringing on additional resources so that a complete Monitoring Team is nearly in place. Specific new roles for additional team members have been delineated, individuals to fill each of these spots have been identified, and contracts are currently being developed.

Some of the timelines originally identified for the development of the monitoring work plan are likely to be affected. This is due to the loss of some materials and work product from the previous administrative organization; the need to develop a new budget and restart the LASD data-request process; and the general lack of continuity in plan development, staffing, and workflow. However, the current team is committed to working closely with the Parties to ensure that the initial delays in this area are quickly overcome.

³ See the "Challenges" section below for further discussion of these changes.

B. Policy Revision and Updates

Below is a summary of LASD's activities relating to the revision and submission of documents (policies and unit orders) identified in the SA and the status of the review process, which is underway. The Monitoring Team applauds LASD for having commenced this work even before the SA was in place and for their continuing efforts to keep this work on track over these past six months.

The following list includes those policies and unit orders that were submitted to the Monitoring Team and DOJ for review. LASD wrote and implemented several of these unit orders and policies prior to signing the SA in a good-faith effort to accelerate their compliance efforts. These unit orders and policies were prioritized by LASD because they were either viewed as being particularly vital elements of the SA or necessary first steps affecting the implementation of other key activities, such as training and community engagement. The Monitoring Team supports LASD's initiative in this regard. Any revisions necessary after review by the DOJ and the Monitoring Team will be incorporated by January 2016. (Note that this section indicates the subject matter of the unit order or policy addressed and its associated SA item numbers. This section does not, however, include the new language submitted for review.)

In order to ensure that changes to policy accurately meet the current Monitoring Team's expectations, as required by the SA, a number of these policy and unit order revisions have been resubmitted to DOJ for formal comment. Approval of this first set of policy and unit orders is an immediate priority. The Monitoring Team will be discussing these policies and all comments with the Parties in early December. For all the policies except the use of force policy, approval is expected at approximately the time of the release of this report on December 15, 2015. The use of force policy will require further review, with final approval expected during the next semiannual reporting period.

1. Unit Orders Updates

These unit orders were provisionally implemented by LASD in 2014, prior to the signing of the SA, and submitted for review by both the DOJ and the Monitoring Team on or before June 12, 2015. LASD received comments from the Monitoring Team on October 5, 2015, and from the DOJ on December 2, 2015. Revisions will be incorporated by January 2016.

- a. Unit Order #68, on supplemental patrol procedures, regarding investigatory stops and detentions, searches, and bias-free policing. Related to SA items 42, 44f, 44g, 44j, 45, 49, 52, 53, 55, and 66b.
- b. Unit Order #69, on supplemental supervisory procedures, regarding investigatory stops and detentions, searches, supervisory review, bias-free policing, community engagement, general use of force reporting policy, use of force supervisory investigations, complaint intake, complaint classification, and investigations. Related to SA items 45, 49, 52, 58, 59, 60, 61, 62, 63, 66b, 67, 87, 88, 109, 115, 116, 117, 118, 125, 126, 128, 130, 131, 134, 133, and 136.
- c. Unit Order #72, on Community Advisory Committees, regarding Antelope Valley community advisory committees, community survey, performance mentoring program, and access and confidentiality. Related to SA items 52, 93, 94, 95, 96, 97, 143,

and 180. While Unit Order #72 is still under review, LASD has taken the step of creating Community Advisory Committees (CAC), and CACs in Lancaster and Palmdale are meeting on an ongoing basis.

2. Policy Updates

LASD implemented the following policies in early 2015, with the exception of item j regarding housing authority inspections, which was implemented in 2012. As of June 12, 2015, LASD had submitted these policy revisions for review by the Monitoring Team and the DOJ.

- a. The policy on Limited English Proficiency in the context of searches, bias-free policing, and complaint intake. Related to SA items 52, 66, and 125.
- b. The policy on photography, audio, and videotaping by the public and members of the press, which establishes a prohibition against discouraging members of the public from documenting police activities. Related to SA item 106.
- c. The policy on seizure of photographic video or audio evidence from a private citizen or member of the press, related to item b., above.
- d. A policy on constitutional policing, regarding the right of members of the public to receive equal protection of the law, without bias as to race, color, ethnicity, national origin, relation, gender, gender identity, disability, or sexual orientation. The related SA item states that stops shall not be initiated because of an individual's actual or perceived immigration status. Also, after review by an expert in constitutional policing, LASD created/revised their policy on consensual encounters. Related to SA item 64.
- e. The policy on stops, seizures, and searches, which establishes that investigatory stops and detentions shall be initiated and carried out based on the tenets of constitutional policing and bias-free policing, as in item d., above. Related to SA items 41, 43, 50, 51, 52, 56, and 64.
- f. A policy on backseat detentions, addressing when and by what rationale backseat detentions can be used and how to handle citizen complaints about such detention. Related to SA items 48 and 49.
- g. The policy on logging public contacts. Related to SA item 44.
- h. The policy on statistical codes for traffic, pedestrian, and bicycle stops. Related to SA item 44.
- i. The policy on logging field activities. Related to SA item 44.
- j. The policy on housing authority non-criminal investigations/inspections (FOD), regarding searches, accompaniment on Section 8 compliance checks, and fair housing reporting and analysis. Related to SA items 54, 76, 77, 78, 79, and 80. (This policy was implemented in 2012 subject to a separate lawsuit.)

As of September 4, 2015, LASD had submitted:

- a. A revised policy on use of force, to address general use of force policy principles, use of force reporting policy, and use of force supervisory investigations. Related to SA items 103, 105, 110, 109, 111a, 111b, 111e, 112a, 112d, 113, 116, 117, 118, and 117.

C. Community Engagement Activities

As part of broader community engagement efforts, the SA requires that LASD work with CACs within the Antelope Valley to leverage the insights and expertise of the community to address policing concerns. CACs were already in place in both Lancaster and Palmdale, but after the DOJ started its investigation in 2011, they were reconfigured to better reflect the diversity of their communities. Some of the more vocal critics of the LASD during the DOJ's investigation now serve on the CACs, and this brings a more diverse representation of community perspectives. Meetings are held at the stations and include members of the community and LASD. Additionally, both stations host and attend a variety of other community meetings and events.

While the specific unit orders associated with CACs are currently under review by DOJ and the Monitoring Team, LASD correctly prioritized this important work and has already implemented these Unit Orders at both stations. This work is responsive to SA item 93 (Palmdale Unit Order #14-07 and Lancaster Unit Order #72).

LASD has begun tracking and providing information on community engagement and outreach meetings, as well as events in which deputies have participated. The information is collected on a tracking form that will be shared with the Monitoring Team on the 15th of each month. The Monitoring Team is reviewing the information provided to determine whether LASD efforts meet the requirements of the SA and if broader outreach and engagement might be required.

In June, July, and August, members of the Monitoring Team met with community members in the following forums to introduce team members to the community, describe their roles moving forward, and begin to establish a base for future community engagement efforts:

- A CAC meeting held at Lancaster Station;
- A "town hall" meeting in Antelope Valley, which included over 100 members of the community;
- A meeting with community members from various segments of the African American community, including The Community Action League and the African American Leadership Council;
- A meeting with a group of community members from the Latino community; and
- Additional informal meetings with community members from throughout the African American community to collect feedback on the current climate of police-community relations in the Antelope Valley.

The Monitoring Team will periodically attend and observe CAC meetings and other community engagement meetings and activities throughout the monitoring period. Through the community survey and its own outreach and data collection, the Monitoring Team will assess to what extent outreach and community engagement efforts have successfully reached representatives of the entire Antelope Valley community and if further efforts are required in that regard.

D. Training Curricula Development and Implementation

SA item #165 mandated that LASD create a training briefing in order to brief all sworn personnel at Palmdale and Lancaster stations on the content of the SA within 180 days following the SA's effective date. LASD's Compliance Unit quickly developed the materials for the training briefing and submitted it to the Monitoring Team for review and approval. Following approval, LASD launched their formal briefings and subsequently reported 100% compliance to the Monitoring Team within the 180-day timeframe.

Monitoring Team members attended one of the training briefings at the Palmdale Station to observe the briefing's content and the trainers' interaction with employees. This briefing was conducted by Commander Mike Parker, Lieutenant Eric Lasko, Sergeant Dan Stanley, and Deputy Charity Brown. The Monitoring Team members who attended noted that the briefing was thorough, consistent with the intent of the SA, and well presented.

The Thomas & Means Law Firm has been retained by LASD to develop the training curricula for certain mandated trainings required by the SA. The firm will be teaching the constitutional policing training, which includes materials on the Fourth and Fourteenth Amendments and stops, searches, and seizures. The firm also will be teaching the training on bias-free policing, which includes training in the areas of equal protection, bias-free policing, human relations, and interpersonal communication. These efforts are responsive to SA items 42, 57 (a-e), 70 (a-i), and 138, and reflective of the spirit of SA items 47, 48, 49, 64, and 65. The Monitoring Team has approved these appointments. The training curricula and accompanying post-training testing for both of these trainings were submitted to DOJ and the Monitoring Team on November 20, 2015. The Compliance Unit has indicated its readiness to implement them immediately upon approval.

Mr. Means will be providing LASD and the Monitoring Team with his proposed materials for conducting quarterly roll-call trainings to emphasize the importance of preventing discriminatory policing (SA item 71) and for structured annual in-service trainings on community policing and problem-oriented policing methods (SA item 89).

The mandated training for supervisors is currently being developed by LASD's Training Bureau. It is unknown when this will be completed, and the Monitoring Team stresses that implementation of this training must await approval of any policy changes that are ultimately required and incorporated into the policies governing use of force, administrative investigations, and investigation of citizen complaints. Supervisor training efforts are responsive to SA items 70, 119, 138, and others.

E. Data Systems

The Monitoring Team has been provided with some briefings on the LASD data systems, as these will be a key element of the monitoring work. These briefings have included an initial meeting with LASD Division Director Dean Gialamas, who provided an introduction to LASD's data collection and management capacities. Data are captured in several databases, including the PPI (use of force, public complaints, administrative investigations, civil claims, and lawsuits), CAD/RAPS (traffic stop data, calls for service, and stops), and LARCIS (crime data and police reports). In the next semiannual reporting period, the Monitoring Team will further assess LASD data management systems and processes in order to ascertain policies, procedures, and practices regarding how each type of data is collected and processed, and what reliability safeguards are in place. A review of data analysis and reporting processes will follow.

Data is an essential element of nearly every monitoring task. While observation, review of documents, and formal and informal interviews and conversation with stakeholders also provide essential information, data will be used to identify characteristics and patterns among the thousands of calls for service, stops, and other interactions between the community and LASD and among various processes and activities that LASD deputies, supervisors, and department leadership engage in to perform their various functions. These characteristics and patterns will be then be used to objectively determine how LASD's practices relate to SA mandates, most importantly those regarding constitutional policing and the fair and equal treatment of all the various Antelope Valley community groups. For this reason, it is extremely important that the Monitoring Team understand and monitor what data are or should be collected; by what methods; and how those data are or should be processed, analyzed, interpreted, and used by LASD, its representatives, and the community.

III. CHALLENGES

While monitoring personnel and project administration changes have delayed the completion of the work plan and the launching of some preliminary tasks, the Monitors and their new team are nevertheless establishing effective working relationships and coordinating well with the Parties. They have also identified which areas require immediate attention and are working closely with the Parties to ensure timely progress is made.

Throughout this initial reporting period, members of the LASD's Compliance Unit have been diligent in carrying out their duties and keeping the Monitors apprised of their work. They have continued to submit revisions to policies, training curricula, and information documenting compliance efforts to the team during this time. In fact, the Monitoring Team's experiences with personnel from the Compliance Unit have been positive and highly productive. There are no concerns relative to the quality of their work or their willingness to take on any task they have been assigned.

Although the Monitors are pleased with the progress and spirit of cooperation displayed by LASD, they have noted and expressed concerns to the agency regarding the long-term adequacy of the staffing level of the Compliance Coordinator's Unit. Based on the work to be done and the aggressive timelines involved, the Monitors feel the current staffing level will need to be increased in the not-too-distant future. A Compliance Unit consisting of three sworn members is insufficient to deal with the numerous tasks involved, which include policy planning and revision, training development and coordination, data collection and analysis, creating public reports, ensuring community engagement,

planning and coordination of activities involving LASD's data system updates, tracking of compliance measures, and investigating Section 8-related civil claims.

While the SA clearly applies exclusively to the experiences and activities of the two Antelope Valley stations, the policy and training implications and the organizational issues involved will likely extend beyond the geographic range of the Antelope Valley. It may be impractical for LASD to develop and refine policies, adopt new performance metrics, and change organizational systems solely in the Antelope Valley region. Therefore, the Monitors urge LASD to consider applying some of the SA-mandated changes systemwide, as appropriate and feasible. Should this occur, the additional work required would be another reason to consider expanding the staffing of this unit.

Furthermore, the Monitors are concerned about the possibility or assumption that the local stations will monitor their own compliance moving forward. That responsibility will likely require further departmental infrastructure, and in the interest of promoting accountability and objectivity, this should be done by a body that will ensure objectivity and be independent in carrying out those duties. The Monitoring Team understands that the current plan is for the existing department-wide auditing unit (Internal Monitoring, Performance Audits, and Accountability Command) to perform long-term oversight and monitoring. The Monitoring Team will assess whether their current staffing levels are sufficient for this additional task and what additional training and institutional support they may need to be successful in ensuring that the gains made in the Antelope Valley during the monitoring period are maintained.

For the preceding reasons and because LASD has set an ambitious goal of achieving full compliance within three years, the Monitors believe it would be prudent and necessary to commit additional members to the LASD Compliance Coordinator's Unit. As a possible model, we urge LASD to give consideration to the plan developed and the model that was utilized by their Custody Division's Compliance Unit in moving forward with the implementation of reforms advocated by the Jail Violence Commission.

The Monitors noted expressions of significant concern among some community members that LASD has not yet changed its practices regarding constitutional policing. The Monitors recognize that there are also Antelope Valley community members who express strong support for the LASD and voice corresponding satisfaction with the LASD's community outreach efforts. However, it does appear that among some groups, there is currently inadequate public awareness and understanding regarding the SA, what it contains, and what this means to the community. At the community meetings, the Monitors heard a desire expressed for a summary of the SA's goals and objectives, written in layman's terms, to be widely disseminated. There were also requests for something along the lines of a "Know Your Rights" pamphlet, or similar information, regarding community members' rights when interacting with law enforcement. LASD reports that they are currently working on updating a trifold pamphlet entitled "What to Do If You Are Stopped by a Deputy Sheriff," which may address some these concerns (SA item 52). This work is encouraging. However, there appears to be a need for further consideration of efforts to support this type of education and outreach. The SA addresses this need, and it is the hope of the Monitors that the Parties recognize the importance of this to the long-term success of these endeavors. Not only do the SA's specific requirements need to be met, but the community also needs to understand the changes that have been made and realize they are empowered to play a role in maintaining that success moving forward.

IV. FUTURE ACTIVITIES

The Monitoring Team's next steps include the following.

A. Immediate Priorities

- Complete the review of policies and unit orders which have already been submitted by LASD. (Expected completion date is December 2015.)
- Prioritize and establish a schedule, in coordination with LASD, of timelines for completion of policy revisions. (Completion of this is expected in January 2016.)
- Complete policy revisions by June 2016.

Approval of departmental policies is critical to establishing compliance. Also, many action items related to procedure and practice in the SA are contingent upon the development or revision of a given policy. While all SA-mandated changes will eventually be made, the Monitoring Team will work with the LASD Compliance Unit to prioritize the review of policies in a manner that keeps other elements of the work plan moving forward and hastens compliance. Other factors that may prioritize one policy change over another include how crucial the policy is to achieving the core goals of the SA and how complicated the changes may be (and thus, how long the process is expected to take). For instance, the use of force policy is particularly far-reaching in the SA and impactful to compliance efforts. Thus, work on changes to the use of force policy has already started and will continue to be a priority.

- Develop an annual work plan. (Expected completion date is January 2016.)

A well-designed, collaborative, and transparent work plan is crucial to the success of the monitoring. The Monitoring Team will draft a work plan establishing first-year objectives, goals, activities, and timelines for the Parties' review.

- Review of the constitutional policing training and the bias-free policing training. (Expected completion date is December 2015.)

B. Additional Priorities for the Next Reporting Period

- Finalizing priorities through discussion with Parties. (Expected completion date is December 2015, with ongoing reassessment as necessary.)

As discussed in previous sections, the monitoring work is currently behind schedule. The Monitoring Team will continue to work with the Parties to identify those areas that require the most immediate attention, in order to avoid any further delays in pursuing timely progress and success in achieving the LASD reforms.

- Additional site visits. (Ongoing and expected to continue throughout the monitoring period.)

Additional site visits accomplish several goals. Site visits help build relationships with departmental personnel and community members. Site visits are integral to collecting the observational data that allow the Monitoring Team to assess the linkage of policy, procedure, and practice and provide a context for quantitative data. Site visits also allow the Monitoring Team to develop a shared understanding of the processes around data collection and documentation of important information regarding meeting the mandates of the SA and long-term compliance.

- Community survey. (First survey expected to be administered in February 2016.)

The community survey is critical to establishing a baseline of information about community attitudes towards LASD and periodic reassessments of changes in those attitudes. The Monitoring Team will oversee the development of the community survey, as well as the methodology used in its implementation.

- Attendance at community meetings. (Ongoing and expected to continue throughout monitoring period.)

The Monitoring Team will attend community meetings to better understand how effectively LASD is engaging with the community.

- Implementation of the work plan.
- An assessment of LASD's data collection and management capacities.

V. CONCLUSION

The Monitors are quite optimistic about the near- and long-term prospects of success for this project. We believe the skill sets and experience among the Monitoring Team now in place are the right fit for establishing effective, collaborative relationships and providing capable oversight that will ensure the goals of the SA are met. We also believe LASD's leadership is committed to supporting and facilitating meaningful change in policing and improving community relations in the Antelope Valley. There are positive signs of this, based on the work underway with policy revisions, community engagement, and the start of new training protocols. The Parties have already shown an ability and willingness to collaborate productively with honesty and transparency through a difficult period, which bodes extremely well as we move into the heart of the work on these reforms.

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