

LOS ANGELES POLICE COMMISSION

**REVIEW OF
SUSPICIOUS ACTIVITY REPORTS
2018**



Conducted by the

OFFICE OF THE INSPECTOR GENERAL

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Inspector General
December 17, 2019

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OFFICE OF THE INSPECTOR GENERAL REVIEW OF SUSPICIOUS ACTIVITY REPORTS – 2018

I. INTRODUCTION AND EXECUTIVE SUMMARY

In 2009, the United States Government established the Nationwide SAR Initiative (NSI) in response to the findings of the 9/11 Commission. The NSI fosters the sharing of information across multiple levels of government to prevent terrorism and other criminal activity.¹ The Los Angeles Police Department (LAPD or Department) began collecting Suspicious Activity Reports (SARs) in 2008 to document reported or observed activity that was believed by officers to have a nexus to foreign or domestic terrorism.² In August 2012, the Department issued Special Order 17—a revised SAR policy—which included a refined list of the activities/behaviors that constitute suspicious activity.^{3,4}

The Office of the Inspector General (OIG) is responsible for conducting annual reviews of the Department's SAR program. The OIG issued a report dated June 11, 2019 on the SAR program that covered the years 2016-2017⁵ and provided recommendations that were subsequently approved by the Board of Police Commissioners (Commission). As the Department is currently in the process of finalizing the implementation of those recommendations, this 2018 review did not factor them into its analysis.

The OIG reviewed a total of 82 SARs from calendar year 2018 and determined that 100% of the SAR classifications complied with current Department Policy.

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¹ U.S. DEP'T. OF HOMELAND SECURITY, NATIONWIDE SAR INITIATIVE, <https://www.dhs.gov/nsi> (last visited December 4, 2019) (“The Nationwide Suspicious Activity Reporting (SAR) Initiative (NSI) is a joint collaborative effort by the U.S. Department of Homeland Security; the Federal Bureau of Investigation; and state, local, tribal, and territorial law enforcement partners. This initiative provides law enforcement with a tool to help prevent terrorism and other related criminal activity by establishing a national capacity for gathering, documenting, processing, analyzing, and sharing SAR information.”).

² OFF. OF THE INSPECTOR GEN. – L.A. POLICE COMM'N., SUSPICIOUS ACTIVITY REPORTING SYSTEM AUDIT, March 12, 2013, https://docs.wixstatic.com/ugd/b2dd23_a000774e4074ac5da6af41f276f3d4b4.pdf (last visited Dec. 5, 2019) (for further background information on the Department's past SAR protocol).

³ L.A. POLICE DEP'T., SPECIAL ORD. NO. 17 (2012), *Reporting Suspicious Activity Potentially Related to Foreign or Domestic Terrorism – Revised; and Suspicious Activity Report Notebook Divider, Form 18.30.03 – Revised* (Aug. 28, 2012 (codified as, “Terrorism Liaison Officer (TLO)’s Responsibilities,” in 4 L.A. POLICE DEPT., SECOND QUARTER DEPARTMENT MANUAL § 271.45).

⁴ The changes detailed in Special Order 17 were based on The Intelligence Reform and Terrorism Prevention Act of 2004 and the National Strategy for Information Sharing in 2007.

⁵ OFF. OF THE INSPECTOR GEN. – L.A. POLICE COMM'N., REVIEW OF SUSPICIOUS ACTIVITY REPROTS 2016 – 2017 (June 11, 2019), https://a27e0481-a3d0-44b8-8142-1376cfbb6e32.filesusr.com/ugd/b2dd23_badabe408e9943e4840b1eb1cbeec1f7.pdf (last visited Dec. 9, 2019).

II. SAR POLICY

Special Order 17 revised the Department's practices to be consistent with the federal Information Sharing Environment (ISE) Functional Standard published in 2009.⁶ It specifies that SARs are to be completed when Department officers directly observe, or receive reports of, activities or behaviors that are, "reasonably indicative of pre-operational planning related to terrorism or other criminal activity."⁷ These activities or behaviors must fall into one of the 16 designated categories listed in the special order.⁸

The list of activities/behaviors provided in Special Order 17 are separated into two groups, with the first group being criminal activity or activity with a potential nexus to terrorism, and the second group being activity that may not be criminal in nature. The special order warns that the First Amendment generally protects some of the activities observed by or reported to officers. As such, they should not be reported in a SAR, "absent articulable facts and circumstances that support suspicion that the behavior observed is not innocent, but rather reasonably indicative of criminal activity associated with terrorism."⁹ This may include, for example, "evidence of pre-operational planning related to terrorism."¹⁰

The policy further states that a SAR should not consider the race, ethnicity, national origin, or religious affiliation of an Involved Person (IP) as a factor creating suspicion.¹¹ It also reminds officers of constitutional and case law relating to search and seizure, and it indicates that officers may not detain a person if they do not have reasonable suspicion of criminal activity or probable cause to make an arrest.

III. DEPARTMENT SAR PROCESSING

Police officers or community members may initiate a SAR when they observe or become aware of activity that they perceive to be suspicious and potentially related to terrorism. Community members initiate most SARs by reporting the suspicious activity to a police officer in the field or at an Area station, but the Department also receives such reports online and through a telephone hotline as a part of the iWatchLA program.¹²

⁶ U.S. DEP'T. OF HOMELAND SECURITY, OFF. OF THE DIR. OF NAT'L INTELLIGENCE, "Information Sharing Environment – Suspicious Activity Report (ISE-SAR) Functional Standard, Version 1.5," Program Manager for the Information Sharing Environment (PM-ISE), Office of the Director of National Intelligence (2009).

⁷ *Id.* at 2 (the Department and federal guidelines also refer to this as potentially having a "nexus to terrorism").

⁸ 4 L.A. POLICE DEP'T., SECOND QUARTER DEPARTMENT MANUAL § 271.45 – "Terrorism Liaison Officer (TLO)'s Responsibilities" (2019).

⁹ L.A. POLICE DEP'T., *supra* note 3.

¹⁰ *Ibid.*

¹¹ *Ibid.* (an, "Involved Person," is an individual that allegedly has been observed engaging in suspicious activity when no definitive criminal activity can be identified, thus precluding identification as a "suspect").

¹² L.A. POLICE DEP'T., iWatchLA, <http://www.lapdonline.org/iwatchla> (last visited December 4, 2019) (iWatchLA "educates the public about behaviors and activities that may have a connection to terrorism").

Upon observing activity believed to be suspicious, or when receiving information from a community member, a police officer may conduct a preliminary investigation where appropriate. If the information is deemed to fall within SAR guidelines, the officer then completes a SAR and forwards it to the Area watch commander for review. Once approved, the SAR is forwarded to Major Crimes Division (MCD), with no copies retained at the area station.¹³ Department personnel can obtain guidance from MCD on completing SARs 24 hours per day, seven days per week, via on-duty personnel or an on-call supervisor.

Upon receiving a SAR, MCD personnel enter the relevant reported information into the Department's Palantir database.¹⁴ The report is analyzed pursuant to the standards described in Special Order 17 to decide whether it will be unfounded or affirmed. If, in the judgment of the SAR Unit, the information provided in the SAR is consistent with one of the Special Order's 16 specified activities/behaviors and is reasonably indicative of terrorism or other criminal activity, the SAR is affirmed. If the SAR does not meet the specified activities/behaviors, the SAR is unfounded.

In cases where the SAR is affirmed, MCD digitally sends the report and any corresponding documentation to the Joint Regional Intelligence Center (JRIC), which has the final authority in accepting or rejecting a SAR.¹⁵ If accepted, JRIC assigns the incident to a specific working group that will follow up on the details provided. In some cases, JRIC accepts LAPD-affirmed SARs on an "Information Only" basis, which indicates that the information will be retained, but that there will not necessarily be immediate follow-up. In either situation, information from accepted SARs is shared with other law enforcement agencies nationwide via the federally-operated Information Sharing Environment (ISE).

If a SAR is unfounded by LAPD, it is not sent to JRIC, and any Involved Person's information is purged from Palantir and CCAD. A hard copy of the report is retained for one year or until the OIG conducts an audit, at which time the record is destroyed in adherence with departmental protocols. For SARs that were affirmed, hard copies are maintained onsite for two years and offsite for three years, before they are then destroyed.¹⁶ The associated information is also purged from Palantir at that time. Occasionally, information and details about an unfounded

¹³ MCD is within the Counter-Terrorism and Special Operations Bureau, Office of Special Operations, LAPD. A Division of Records (DR) Number and incident number will also be assigned to each SAR in the Consolidated Crime and Arrest Database (CCAD).

¹⁴ Palantir is an online platform, accessible via the Department's intranet, which provides integrated access to information stored in multiple law enforcement databases. Although every sworn employee has access to basic Palantir functionality, access to SARs is restricted. Authorization to view SARs in Palantir is limited to employees of MCD and select employees given temporary access, such as OIG personnel performing this review. Temporary access expires once the need for access has concluded.

¹⁵ See JOINT REGIONAL INTELLIGENCE CENTER, <https://www.jric.org> (last visited Dec. 4, 2019) (JRIC is a multi-agency collaboration of federal, state, and local law enforcement agencies formed to collect, analyze, and disseminate threat-related information. The Norwalk JRIC facility deals with threat intelligence for Los Angeles County and six surrounding counties, and it is also capable of disseminating information to agencies outside of its primary operation zone).

¹⁶ Affirmed SARs are to be maintained for 5 years, in accordance with the Department's document retention policy, while unfounded SARs are secured in a locked file cabinet at MCD for one year, or until reviewed by the OIG, at which point they are to be destroyed.

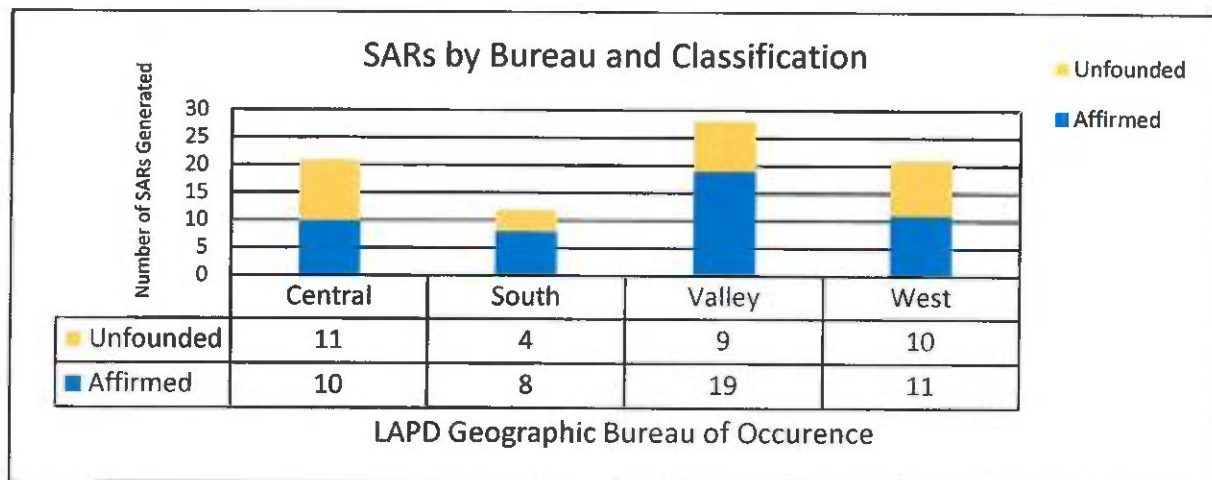
SAR are forwarded to other departmental units for further investigation if it is deemed necessary based on the underlying action or potential crime described in the SAR.

The Department receives courtesy copies of SARs from allied agencies such as the Los Angeles Unified School District Police and the Los Angeles World Airport Police departments. MCD will process those SARs according to the same policies as previously described. There are cases where the allied agency has also made a report directly to JRIC, creating a duplicate SAR. In such cases, MCD notes that the allied agency previously submitted the SAR to JRIC, and that MCD received a courtesy copy.

IV. STATISTICAL OVERVIEW

A. SARs by Location of Occurrence and LAPD Classification

The OIG reviewed a total of 82 SARs generated by the Department during calendar year 2018. Of those, 48 (about 59 percent) were affirmed and 34 (about 41 percent) were unfounded. JRIC accepted 24 (50 percent) of the 48 SARs that the Department affirmed. The breakdown of 2018 SARs by Bureau and Classification can be seen in the following table:



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B. Reported Activities and Behaviors

In the table below, the OIG captured and listed the primary activities/behaviors reported in each affirmed SAR. The most common activities/behaviors as documented on the SAR were:

Expressed or Implied Threat, Observation/Surveillance, and Photography.

Affirmed SARs by Activity Type		
Activity/Behavior Type	Number and Percent	
Aviation Activity	1	2%
Breach/Attempted Intrusion	3	6%
Expressed / Implied Threat	24	50%
Material Acquisition/Storage	1	2%
Misrepresentation	2	4%
Observation/Surveillance	9	19%
Photography	4	8%
Recruiting	1	2%
Sabotage/Tampering/Vandalism	2	4%
Testing or Probing	1	2%
Total	48	100%¹⁷

C. Descent of Involved Persons

As previously noted, Special Order 17 specifies that race, ethnicity, national origin, or religious affiliation should not be considered as factors that create suspicion. However, these factors may be used in describing an Involved Person who is the subject of a SAR. The following tables provide the breakdown of the Descent listed for the primary Involved Person on each SAR, the Gender documented for that person, and whether JRIC accepted the SAR (for affirmed SARs only). It is important to note that the race/ethnicity categorizations associated with Involved Persons, which are used by the Department to populate the Descent field, are in many cases based on the perception communicated by the person who initiates a SAR.

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¹⁷ Due to rounding, percentages shown may not add up to 100.

The table below breaks down 2018 SARs by the reported Involved Persons' Descent and Gender, LAPD's Classification of each SAR, and the Outcome of affirmed SARs:

SARs by Descent, Gender, Classification, and Outcome							
Reported Descent	Total SARs	Reported Gender			LAPD Classification		JRIC Result
		Male	Female	Unknown	Affirmed	Unfounded	Accepted
Asian	2	2	-	-	-	2	-
Black	8	7	1	-	5	3	1
Hispanic	17	14	3	-	11	6	3
Indian	1	1	-	-	-	1	-
Middle East	1	1	-	-	-	1	-
Other	12	12	-	-	7	5	4
Unknown	19	7	1	11	14	5	11
White	22	20	2	-	11	11	5
Grand Total	82	64	7	11	48	34	24

D. Identified Involved Persons

The OIG found that 44 SARs contained information that could identify the Involved Party, while the information supplied in the remaining SARs was insufficient to identify a specific person as an Involved Party. Of the 44 SARs with identifiable information, MCD affirmed and submitted 23 to JRIC. The remaining 21 of these SARs were unfounded by MCD. Of the 23 SARs with identifiable information that were submitted, JRIC, in turn, accepted 9.

The following table indicates the Descent, Classification, and Outcome for each Involved Person whose name or other identifying information was captured in a SAR:

Named Involved Persons in SARs by Descent, Classification, and Outcome				
Reported Descent	Total	Unfounded	Affirmed	Accepted by JRIC
Asian	2	2	-	-
Black	6	3	3	-
Hispanic	11	6	5	2
Indian	-	-	-	-
Middle East	1	1	-	-
Other	8	3	5	3
Unknown	2	1	1	1
White	14	5	9	3
Grand Total	44	21	23	9

As noted in the OIG's previous report on SARs, issued in June 2019, the use of, "Other," as an identifier continued during the 2018 SAR reporting period. Approximately 15 percent of SARs listed the Involved Person as, "Other," down from 24 percent in 2017 and 26 percent in 2016.

V. OIG REVIEW OF 2018 SUSPICIOUS ACTIVITY REPORTS

A. Classification of SARs

A primary focus of the OIG SAR review, in addition to ensuring compliance with procedural standards, is to determine whether affirmed SARs adhered to the standards related to activities/behaviors set forth in Special Order 17. For the Department to affirm the activities/behaviors described in the SARs, there must be, "articulable facts and circumstances supporting the allegation that the behavior observed is not innocent and is reasonably indicative of criminal activity associated with terrorism."¹⁸

Based on the information provided, the OIG determined that all of the Department's SAR classifications complied with the SAR policy.

B. Notable Trends

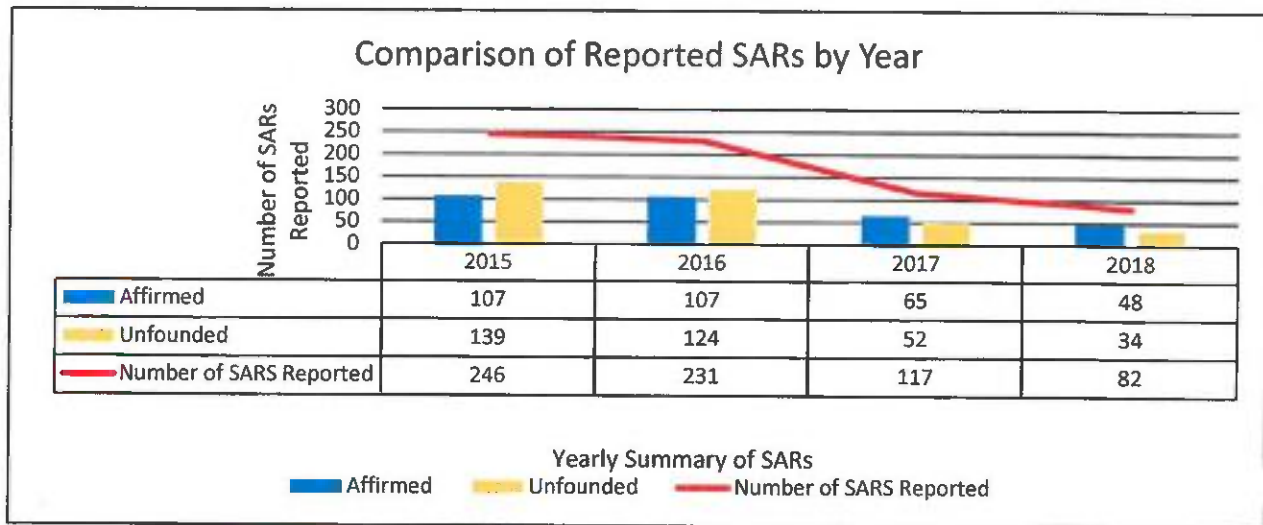
Reduction in SARs

There has been a consistent decline in the number of SARs reported from 2015 through 2018. The Department attributed this reduction to several factors, including but not limited to: additional training of area personnel on elements of a SAR, consultations with MCD prior to submission, and the public utilizing other governmental portals to submit information about potential terrorist activities, such as the Department of Homeland Security and the Federal Bureau of Investigation.

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¹⁸ 4 L.A. POLICE DEP'T., SECOND QUARTER DEP'T. MANUAL § 271.45 – "Terrorism Liaison Officer (TLO)'s Responsibilities" (2019).

The following table provides a breakdown of the number of SARs reported by year:



Hypervigilance - Public Awareness

In contrast to the decreasing number of SARs overall, the OIG noted a rise in SARs submitted subsequent to a terrorist event. During the first quarter of 2018, there were two school shootings resulting in mass casualties.¹⁹ The LAPD received five SARs related to school threats during that same quarter, all of which were initiated by school personnel. Out of the five SARs received, the Department unfounded two and affirmed the remaining three; JRIC ultimately rejected all three of those affirmed SARs.

VI. DEPARTMENT RESPONSE

The OIG discussed this report with Department representatives, who agreed with its findings and expressed no other concerns.

VII. RECOMMENDATIONS

Noting that the Department is finalizing its implementation of the recommendations previously made by the OIG and adopted by the Commission with regard to SARs, and based on the findings set forth in this report, the OIG has no additional recommendations at this time.

¹⁹ FBI, *Active Shooter Incidents in the United States in 2018*, <https://www.fbi.gov/file-repository/active-shooter-incidents-in-the-us-2018-041019.pdf/view> (last visited Dec. 4, 2019).

VIII. APPENDIX

A. Special Order No. 17 – 2012

OFFICE OF THE CHIEF OF POLICE

SPECIAL ORDER NO. 17

August 28, 2012

APPROVED BY THE BOARD OF POLICE COMMISSIONERS ON AUGUST 28, 2012

SUBJECT: REPORTING SUSPICIOUS ACTIVITY POTENTIALLY RELATED
TO FOREIGN OR DOMESTIC TERRORISM - REVISED; AND SUSPICIOUS
ACTIVITY REPORT NOTEBOOK DIVIDER, FORM 18.30.03 - REVISED

PURPOSE: This Order revises the procedures for reporting suspicious activity potentially related to foreign or domestic terrorism to be consistent with the Office of the Director of National Intelligence, Information Sharing Environment Functional Standards Suspicious Activity Reporting. Officers are reminded of the Fourth Amendment to the United States Constitution as it pertains to search and seizure, and the United States Supreme Court Case *Terry vs. Ohio* as it pertains to stop and frisk. Furthermore, the Office of the Inspector General will review the Suspicious Activity Report process on an annual basis as part of their audit/inspection responsibilities.

PROCEDURE: Attached are the revised Department Manual Section 1/590, renamed as *Reporting Suspicious Activity Potentially Related to Foreign or Domestic Terrorism*; Section 4/271.46, *Reporting Suspicious Activity Potentially Related to Foreign or Domestic Terrorism*; and the Suspicious Activity Report (SAR) Notebook Divider, Form 18.30.03, with revisions in italics. Manual Section 4/271.46 is revised to provide relevant definitions and clarifies the employee's responsibilities regarding the investigation and reporting of suspicious activity.

FORM AVAILABILITY: The Suspicious Activity Report Notebook Divider is available in LAPD E-Forms on the Department's Local Area Network (LAN). All other versions of the SAR Notebook Divider shall be marked "obsolete" and placed into the divisional recycling bin.

AMENDMENTS: This Order amends Sections 1/590 and 4/271.46 of the Department Manual.

AUDIT RESPONSIBILITY: The Commanding Officer, Internal Audits and Inspections Division, will review this directive and determine whether an audit or inspection will be conducted in accordance with Department Manual Section 0/080.30.



CHARLIE BECK
Chief of Police

Attachments

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**DEPARTMENT MANUAL
VOLUME I**

Revised by Special Order No. 17, 2012

590. REPORTING *SUSPICIOUS ACTIVITY* POTENTIALLY RELATED TO FOREIGN OR DOMESTIC TERRORISM. It is the policy of the Los Angeles Police Department to make every effort to accurately and appropriately gather, record and analyze information of a criminal or non-criminal nature that could indicate activities or intentions related to either foreign or domestic terrorism. These efforts shall be carried out in a manner that protects the information, privacy and legal rights of Americans, and therefore, such information shall be recorded and maintained in strict compliance with existing federal, state and Department guidelines regarding Criminal Intelligence Systems [28 Code of Federal Regulations (CFR), Part 23 and applicable California State Guidelines].

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271.46 REPORTING SUSPICIOUS ACTIVITY POTENTIALLY RELATED TO FOREIGN OR DOMESTIC TERRORISM.

DEFINITIONS.

***Suspicious Activity.** Suspicious Activity is defined as observed behavior reasonably indicative of pre-operational planning related to terrorism or other criminal activity.*

***Terrorism.** Terrorism is defined as the unlawful use of force and violence against persons or property to intimidate or coerce a government, the civilian population, or any segment thereof, in furtherance of political or social objectives. This is consistent with the Code of Federal Regulations (28 C.F.R. Section 0.85). This definition includes individuals and groups who plan, threaten, finance, aid/abet, and attempt or perform unlawful acts in furtherance of terrorist activity.*

Suspicious Activity Report. A Suspicious Activity Report (SAR), Form 03.24.00, is an official documentation of observed behavior reasonably indicative of pre-operational planning related to terrorism or other criminal activity. The SAR is a stand-alone report. The information reported in a SAR may result from observations or investigations by police officers, or may be reported to them by private sources.

These terrorism-related behaviors may indicate intelligence gathering or pre-operational planning related to terrorist activities or other criminal activity. These activities and behaviors include:

Criminal Activity and Potential Terrorism Nexus Activity.

- **Breach/Attempted Intrusion.** Unauthorized individuals attempting to or actually entering a facility/infrastructure or protected site;
- **Misrepresentation.** Presenting false or misusing insignia, documents, and/or identification to misrepresent one's affiliation to cover possible illicit activity. Impersonation of any authorized personnel (e.g., police, security, or janitor);
- **Theft/Loss/Diversion.** Stealing or diverting (obtaining or acquiring) something associated with a facility/infrastructure [e.g., badges, uniforms, identification, emergency vehicles, technology or documents (classified or unclassified), which are proprietary to the facility];
- **Sabotage/Tampering/Vandalism.** Damaging, manipulating, or defacing part of a facility/infrastructure or protected site;
- **Cyber Attack.** Compromising or attempting to compromise or disrupt an organization's information technology infrastructure;
- **Expressed or Implied Threat.** Communicating a spoken or written threat to damage or compromise a facility/infrastructure, protected site, and cyber-attacks; or,
- **Aviation Activity.** Operation or attempted operation of an aircraft in a manner that reasonably may be interpreted as suspicious or posing a threat to people, buildings/facilities, infrastructures, or protected sites. Such operation may or may not be a violation of Federal Aviation Administration regulations.

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Potential Criminal or Non-Criminal Activity Requiring Additional Fact Information During an Investigation.

- **Eliciting Information.** Questioning individuals at a level beyond mere curiosity about particular facets of a facility's or building's purpose, operations, security procedures, etc., that would arouse suspicion in a reasonable person;
- **Testing or Probing of Security.** Deliberate interactions with, or challenges to, installations, personnel, or systems that reveal physical, personnel or cyber security capabilities;
- **Recruiting.** Building of operations teams and contacts, personal data, banking data or travel data;
- **Photography.** Taking pictures or videos of facilities/buildings, infrastructures, or protected sites in a manner that would arouse suspicion in a reasonable person. Examples include taking pictures or videos of ingress/egress, delivery locations, personnel performing security functions (e.g., patrol, badge/vehicle checking), security-related equipment (e.g., perimeter fencing, security cameras), etc.;
- **Observation/Surveillance.** Demonstrating unusual interest in facilities/buildings, infrastructures or protected sites beyond mere casual or professional (e.g., engineers) interest, such that a reasonable person would consider the activity suspicious. Examples include observations through binoculars, taking notes, attempting to measure distances, etc.;
- **Materials Acquisition/Storage.** Acquisition and/or storage of unusual quantities of materials such as cell phones, pagers, fuel, chemicals, toxic materials, and timers, such that a reasonable person would consider the activity suspicious;
- **Acquisition of Expertise.** Attempts to obtain or conduct training in security concepts, military weapons or tactics, or other unusual capabilities such that a reasonable person could consider the activity suspicious;
- **Weapons Discovery.** Discovery of unusual amounts of weapons, explosives, or their components that would arouse suspicion in a reasonable person; or,
- **Sector-Specific Incident.** Actions associated with a characteristic of unique concern to specific sectors (such as the public health sector) with regard to their personnel, facilities, systems or functions.

Note: These activities are generally protected by the First Amendment to the United States Constitution and should not be reported in a SAR, absent articulable facts and circumstances that support suspicion that the behavior observed is not innocent, but rather reasonably indicative of criminal activity associated with terrorism, including evidence of pre-operational planning related to terrorism. Race, ethnicity, national origin, or religious affiliation should not be considered as factors that create suspicion (although these factors may be used as specific-involved person descriptors).

Involved Person (IP). An involved person (IP) is an individual who has been observed engaging in suspicious activity, when no definitive criminal activity is identified, thus precluding their identification as a suspect.

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Potential Target. A potential target is a person, facility/building, infrastructure or protected site that is or may be the object of the suspicious activity.

REPORTING AND INVESTIGATIVE RESPONSIBILITIES FOR SAR-RELATED INCIDENTS AND CRIME AND/OR ARREST REPORTS. All reports of suspicious activity is to be reported on a SAR. The Division of Records (DR) number for all associated reports (e.g., Property Report, Form 10.01.00; Investigative Report (IR), Form 03.01.00; and Arrest Report, Form 05.02.00) is to be listed in the space provided on the upper left-hand corner of the SAR face sheet.

Employee's Responsibilities. Any Department employee receiving any information regarding suspicious activity and/or observing any suspicious activity is to investigate and take appropriate action, *including* any tactical response or notifications to specialized entities.

Note: This section does not preclude, in any way, an employee taking immediate action during the commission of a criminal act, or in circumstances which require the immediate defense of life, regardless of the nature of origin.

Activities that are generally protected by the First Amendment should not be reported as a SAR, unless additional facts and circumstances can be clearly articulated that support an officer's or agency's determination that the behavior observed is reasonably indicative of criminal activity associated with terrorism or other criminal activity.

Officers are reminded of constitutional and case law as they pertain to search and seizure, and to stop and frisk. Officers, who have neither reasonable suspicion to detain nor probable cause to arrest, cannot legally prevent an individual from walking away.

Consensual Encounter. A consensual encounter is an encounter between a police officer and an individual in which the individual voluntarily agrees to stop and speak with the officer. The individual is free to leave at any time during a consensual encounter unless there is reasonable suspicion to detain or probable cause to arrest.

Lawful Detention. A lawful detention must be based on *reasonable suspicion* that criminal activity has taken place or is about to take place, and that the person detained is connected to that activity.

Arrest. Probable cause to arrest is a set of facts that would cause a person of ordinary care and prudence to entertain an honest and strong suspicion that the person to be arrested is guilty of a crime.

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- **If the suspicious activity observed (e.g., suspicious behaviors or activities only) is not directly related to a reportable crime and/or any other type of investigation:**
 - Record the information collected from the person reporting, or officer's observations on a SAR;
 - If the potential target of the activity can be identified (e.g., government, person, building/facility, infrastructure or protected site, or an official being surveilled), that location or individual *is to* be listed within the "Potential Target" section of the SAR. Otherwise the "City of Los Angeles" *is to* be listed as the potential target;
 - List the person reporting within the "Witness" section of the SAR. If the person reporting refuses to identify themselves, list them as "Anonymous";
 - List any additional witnesses;
 - List the parties engaged in the suspicious behavior as Involved Persons within the "Involved Persons" portion of the SAR. **With no reportable crime, they cannot be listed as suspects.** Utilize page 2 of the SAR to include additional descriptive information;
 - Notify the watch commander, Area of occurrence. Upon approval by the watch commander, ensure that the Area Records Unit is made aware of the report and immediately assigns a DR and incident number for the SAR. **Refer to the Area Records Unit's Responsibilities Note Section regarding manual DR numbers;**
 - If there is property or evidence associated with the suspicious activity, **a separate Property Report is to be completed. The Property Report is to bear a separate DR and incident number from the SAR, along with the following:**
 - The Evidence box *is to* be marked;
 - The Investigative Unit box *is to* be Major Crimes Division (MCD);
 - The Connecting Reports box *is to* be marked "None";
 - In the narrative portion of the report, officers *are to* write, "Do not release or destroy prior to contacting MCD. Below listed property booked on advice from MCD";
 - The Property Report DR number *is to* be referenced in the "Prop Rpt DR#" box provided on the upper left-hand corner of the SAR face sheet;
 - The booked property and the Property Report *is to* remain in the division of occurrence;
 - Send the **original** SAR to Counter Terrorism and Special Operations Bureau (CTSOB)/MCD, Stop 400, as soon as practicable, but no later than 24 hours after the report is taken and faxed to MCD. **No copies of the SAR are to be maintained at the Area.**

Note: The SAR DR and incident numbers are not to be referenced in the Property Report or any other report.

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- If the suspicious activity observed is related to a criminal or other type of investigation (e.g., bomb threat, vandalism, trespass, assault, domestic violence, impound, narcotics, property report, etc.), officers *are to* complete the following:
 - Complete the investigation and any appropriate reports [e.g., IR; Arrest Report; Property Report; Vehicle Report, CHP 180 (impound) and/or any other related reports];
 - Complete a SAR with a separate DR and incident number. Refer to the Area Records unit's Responsibilities Note Section regarding manual DR numbers;
 - Ensure that the DR number(s) of all completed crime, arrest, and/or property reports are listed and referenced in the appropriate boxes provided in the upper left-hand corner of the SAR face sheet. Include any additional information that provides the nexus to terrorism within the narrative of the SAR on page 2;
 - Ensure that the SAR DR and incident numbers are not referenced in any other reports, e.g., crime, arrest, etc.;

Note: The physical disclosure of a SAR during criminal and/or civil discovery should only occur pursuant to a lawful court order.

- Notify the watch commander, Area of occurrence. Upon approval by the watch commander, ensure that the Area Records Unit is made aware of the report. These reports *are to* be processed separately;
- Notify MCD [contact Real-Time Analysis and Critical Response (RACR) Division for off-hours notification] if the report involves an arrest or a crime with follow-up potential; and,
- Send the **original** SAR, including a copy of all associated reports, to CTSOB/MCD, Stop 400, as soon as practicable, but no later *than* 24 hours after the report is taken and faxed to MCD. **No copies of the SAR are to be maintained at the Area.**

Note: Employees may reference that a SAR was completed and indicate the SAR DR number **only**, and not the involved person's information in their Daily Field Activities Report (DFAR), Form 15.52.00, e.g., "a SAR was completed, DR No. ___." The involved person's name(s) from the SAR *are not to* be documented on the aforementioned report or any other related reports, e.g., IR, Arrest, etc.

Hazardous Devices Materials Section, Emergency Services Division – Responsibility.
Personnel assigned to the Explosive Unit (Bomb Squad), Hazardous Materials Unit, or Los Angeles Police Department Bomb Detection Canine (K-9) Section are to ensure that a SAR is completed on all incidents on which they respond where a potential nexus to terrorism exists. Suspicious Activity Reports completed by personnel assigned to these units shall be processed through a geographic Area Records Unit as directed below.

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Watch Commander's Responsibilities. Upon notification that officers have received information regarding suspicious activity, the watch commander *is to*:

- Ensure that the information supports the completion of a SAR and that no greater law enforcement response or notifications to MCD are currently needed;
- Review the SAR for completeness; and,
- Ensure the Area Records Unit immediately assigns a DR number for the SAR, enters the information into the Consolidated Crime Analysis Database (CCAD) system, forwards the **original SAR**, including a **copy of all associated reports** to MCD, and faxes all reports to MCD no later than 24 hours after the report is taken. **Refer to the Area Records Unit's Responsibilities Note Section regarding manual DR numbers.**

Note: Supervisors and watch commanders may reference that a SAR was completed and indicate the SAR DR number **only**, and not the involved person's information in their Sergeant's Daily Report, Form 15.48.00, or Watch Commander's Daily Report, Form 15.80.00, e.g., "SAR report completed, DR No.____." The involved person's name(s) from the SAR *is not to* be documented on the aforementioned reports or any other related reports, e.g., IR, Arrest, etc.

Major Crimes Division's Responsibilities. Upon receiving a telephonic notification of suspicious activity, MCD personnel *will*, when appropriate, conduct immediate debriefs of arrestees, and/or witnesses, and provide the appropriate guidance to patrol officers. Upon receiving a SAR which has been forwarded and faxed to MCD, assigned MCD personnel *are to* follow established protocols regarding the processing of such information. **Refer to the Area Record Unit's Responsibilities Note Section regarding manual DR numbers and MCD's responsibilities in reference to this.**

Area Records Unit's Responsibilities. Upon receipt of the original SAR and associated reports (e.g., Property Report, IR, and/or Arrest Report, etc.), records personnel *are to*:

- Assign DR number(s) for the SAR and other related reports, as appropriate;

Note: If unable to obtain a DR number, **DO NOT** obtain a **manual DR number** for the SAR and do not keep a copy of the SAR. Forward the original SAR to the SAR Unit, MCD, Stop 400 and fax it to MCD. The SAR Unit personnel will obtain the required DR number and incident number. If an arrest is involved, MCD will notify the Area of a **manual SAR DR number**.

- Ensure that the DR number(s) of all associated reports (crime, arrest, property, and/or impound report, etc.) are listed in the appropriate boxes provided on the face sheet of the SAR;
- Enter the information into the CCAD system, including any appropriate CTSOB-related codes; and,
- Send the original SAR, including a copy of all associated reports, to "CTSOB/MCD, Stop 400" as soon as practicable, but no later than 24 hours after the report is taken and faxed to MCD. No copies of the SAR *are to* be maintained at the Area.

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Area Detective's Responsibilities. For any associated reports, (e.g., Property Report, IR, and/or Arrest Report, etc.), which arrive at an Area Detective Division without having been reviewed by MCD personnel, Area detectives are to:

- Immediately notify MCD and forward the SAR to MCD (No copies of the SAR are to be retained at the Area) and fax copies of the SAR and all reports to MCD. Refer to the Area Records Unit's Responsibilities Note Section regarding manual DR numbers;
- Ensure the SAR has been screened by MCD personnel; and,
- Complete any criminal investigation per existing Department policies and guidelines.

Counter-Terrorism and Special Operations Bureau - Responsibility. *Counter-Terrorism and Special Operations Bureau is responsible for providing Department personnel with training pertaining to the proper handling of suspected terrorism-related activity and ensuring adherence to the guidelines established regarding developmental information and intelligence systems.*

SUSPICIOUS ACTIVITY REPORT

These guidelines should be followed for investigations of Suspicious Activity.

POLICY:

It is the policy of the Los Angeles Police Department to make every effort to accurately and appropriately gather, record and analyze information of a criminal or non-criminal nature that could indicate activities or intentions related to either foreign or domestic terrorism, in a manner that protects the information, privacy and legal rights of Americans.

DEFINITIONS:

SUSPICIOUS ACTIVITY

Suspicious Activity is defined as observed behavior reasonably indicative of pre-operational planning related to terrorism or other criminal activity.

TERRORISM

Terrorism is defined as the unlawful use of force and violence against persons or property to intimidate or coerce a government, the civilian population, or any segment thereof, in furtherance of political or social objectives. This is consistent with the Code of Federal Regulations (28 C.F.R. Section 0.85). This definition includes individuals and groups who plan, threaten, finance, aid/abet, and attempt or perform unlawful acts in furtherance of terrorist activity.

SUSPICIOUS ACTIVITY REPORT

A Suspicious Activity Report (SAR), Form 03.24.00, is an official documentation of observed behavior reasonably indicative of pre-operational planning related to terrorism or other criminal activity. The SAR is a stand-alone report. The information reported in a SAR may result from observations or investigations by police officers, or may be reported to them by private sources.

Note: A SAR shall only be completed for those activities and behaviors specifically listed or defined under "Reportable Suspicious Activities" (see page 2).

INVOLVED PERSON

An involved person (IP) is an individual who has been observed engaging in suspicious activity, when no definitive criminal activity can be identified, thus precluding their identification as a suspect.

POTENTIAL TARGET

A potential target is a person, facility/building, infrastructure or protected site that is or may be the object of the suspicious activity.

EMPLOYEE'S REPORTING RESPONSIBILITIES:

Any Department employee receiving any information regarding suspicious activity and/or observing any suspicious activity shall investigate and take appropriate action, including any tactical response or notifications to specialized entities.

I. If the suspicious activity observed (e.g., suspicious behaviors or activities only) is not directly related to a reportable crime and/or any other type of investigation:

- ☐ Record the information collected from the person reporting, or officer's observations on a SAR;
- ☐ If the potential target of the activity can be identified (e.g., government, person, building/facility, infrastructure or protected site, or an official being surveilled), that location or individual is to be listed within the "Potential Target" section of the SAR. Otherwise the "City of Los Angeles" is to be listed as the potential target;

- ☐ List the person reporting within the "Witness" section of the SAR. If the person reporting refuses to identify themselves, list them as "Anonymous";
- ☐ List any additional witnesses;
- ☐ List the parties engaged in the suspicious behavior as Involved Persons within the "Involved Persons" portion of the SAR. **With no reportable crime, they cannot be listed as suspects.** Utilize page 2 of the SAR to include additional descriptive information;
- ☐ Notify the watch commander, Area of occurrence. Upon approval by the watch commander, ensure that the Area Records Unit is made aware of the report and immediately assigns a DR and incident number for the SAR. Refer to the Area Records Unit's Responsibilities Note Section regarding manual DR numbers;
- ☐ If there is property or evidence associated with the suspicious activity, **a separate Property Report is to be completed. The Property Report is to bear a separate DR and incident number from the SAR, along with the following:**

- a. The Evidence box is to be marked;
- b. The Investigative Unit box is to be Major Crimes Division (MCD);
- c. The Connecting Reports box is to be marked "None";
- d. In the narrative portion of the report, officers are to write, "Do not release or destroy prior to contacting MCD. Below listed property booked on advice from MCD";

- ☐ The Property Report DR number is to be referenced in the "Prop Rpt DR#" box provided on the upper left-hand corner of the SAR face sheet;
- ☐ The booked property and the Property Report is to remain in the division of occurrence;
- ☐ Send the original SAR to Counter Terrorism and Special Operations Bureau (CTSOB)/MCD, Stop 400, as soon as practicable, but no later than 24 hours after the report is taken and faxed to MCD. **No copies of the SAR are to be maintained at the Area.**

Note: The SAR DR and incident numbers shall not be referenced in the Property Report or any other report.

II. If the suspicious activity observed is related to a criminal or other type of investigation (e.g., bomb threat, vandalism, trespass, assault, domestic violence, impound, narcotics, property report, etc.), officers **are** to complete the following:

- ☐ Complete the investigation and any appropriate reports [e.g., IR; Arrest Report; Property Report; Vehicle Report, CHP 180 (Impound) and/or any other related reports];
- ☐ Complete a SAR with a separate DR and incident number. Refer to the Area Records Unit's Responsibilities Note Section regarding manual DR numbers;
- ☐ Ensure that the DR number(s) of all completed crime, arrest, and/or property reports are listed and referenced in the appropriate boxes provided in the upper left-hand corner of the SAR face sheet. Include any additional information that provides the nexus to terrorism within the narrative of the SAR on page 2;
- ☐ Ensure that the SAR DR and incident numbers are not referenced in any other reports, e.g., crime, arrest, etc.;

Note: The physical disclosure of a SAR during criminal and/or civil discovery should only occur pursuant to a lawful court order.

SUSPICIOUS ACTIVITY REPORT

These guidelines should be followed for investigations of Suspicious Activity.

- ☐ Notify the watch commander, Area of occurrence. Upon approval by the watch commander, ensure that the Area Records Unit is made aware of the report. These reports are to be processed separately.
- ☐ Notify MCD [contact Real-Time Analysis and Critical Response (RACR) Division for off-hours notification] if the report involves an arrest or a crime with follow-up potential; and,
- ☐ Send the original SAR, including a copy of all associated reports, to CTSOB/MCD, Stop 400, as soon as practicable, but no later than 24 hours after the report is taken and faxed to MCD. No copies of the SAR are to be maintained at the Area.

Note: Employees may reference that a SAR was completed and indicate the SAR DR number only and not the involved person's information in their Daily Field Activities Report (DFAR), Form 15.52.00, e.g., "A SAR was completed, DR No. ____." The involved person's name(s) from the SAR are not to be documented on the aforementioned report or any other related reports, e.g., IR, Arrest, etc.

SUPERVISORS & WATCH COMMANDERS may reference that a SAR was completed and indicate the SAR DR number only, and not the involved person's information in their Sergeant's Daily Report, Form 15.48.00, or Watch Commander's Report, Form 15.80.00, e.g., "SAR Report completed, DR No. ____." The involved person's name(s) from the SAR is not to be documented on the aforementioned reports, or any other related reports, e.g., IR, Arrest, etc. Please refer to Department Manual Section 4/271.46 for the supervisor's and watch commander's responsibilities.

NOTIFICATIONS:

Notify CTSOB/MCD (contact RACR Division for off-hours notification) for guidance if the report involves any incident of significance, an arrest or a crime with any follow-up potential.

REPORTABLE SUSPICIOUS ACTIVITIES:

These terrorism-related behaviors may indicate intelligence gathering or pre-operational planning related to terrorist activities or other criminal activity. These activities and behaviors include:

Criminal Activity and Potential Terrorism Nexus Activity

- **Breach/Attempted Intrusion.** Unauthorized individuals attempting to or actually entering a facility/infrastructure or protected site;
- **Misrepresentation.** Presenting false or misusing insignia, documents, and/or identification to misrepresent one's affiliation to cover possible illicit activity. Impersonation of any authorized personnel (e.g., police, security, or janitor);
- **Theft/Loss/Diversión.** Stealing or diverting (obtaining or acquiring) something associated with a facility/infrastructure [e.g., badges, uniforms, identification, emergency vehicles, technology or documents (classified or unclassified), which are proprietary to the facility];
- **Sabotage/Tampering/Vandalism.** Damaging, manipulating, or defacing part of a facility/infrastructure or protected site;
- **Cyber Attack.** Compromising or attempting to compromise or disrupt an organization's information technology infrastructure;
- **Expressed or Implied Threat.** Communicating a spoken or written threat to damage or compromise a facility/infrastructure, protected site, and cyber-attacks; or,

- **Aviation Activity.** Operation or attempted operation of an aircraft in a manner that reasonably may be interpreted as suspicious or posing a threat to people, buildings/facilities, infrastructures, or protected sites. Such operation may or may not be a violation of Federal Aviation Administration regulations.

Potential Criminal or Non-Criminal Activity Requiring Additional Fact Information During an Investigation

- **Eliciting Information.** Questioning individuals at a level beyond mere curiosity about particular facets of a facility's or building's purpose, operations, security procedures, etc., that would arouse suspicion in a reasonable person;
- **Testing or Probing of Security.** Deliberate interactions with, or challenges to, installations, personnel, or systems that reveal physical, personnel or cyber security capabilities;
- **Recruiting.** Building of operations teams and contacts, personal data, banking data or travel data;
- **Photography.** Taking pictures or videos of facilities/buildings, infrastructures, or protected sites in a manner that would arouse suspicion in a reasonable person. Examples include taking pictures or videos of ingress/egress, delivery locations, personnel performing security functions (e.g., patrol, badge/vehicle checking), security-related equipment (e.g., perimeter fencing, security cameras), etc.;
- **Observation/Surveillance.** Demonstrating unusual interest in facilities/buildings, infrastructures or protected sites beyond mere casual or professional (e.g., engineers) interest, such that a reasonable person would consider the activity suspicious. Examples include observations through binoculars, taking notes, attempting to measure distances, etc.;
- **Materials Acquisition/Storage.** Acquisition and/or storage of unusual quantities of materials, such as cell phones, pagers, fuel, chemicals, toxic materials, and timers, such that a reasonable person would consider the activity suspicious;
- **Acquisition of Expertise.** Attempts to obtain or conduct training in security concepts, military weapons or tactics, or other unusual capabilities such that a reasonable person could consider the activity suspicious;
- **Weapons Discovery.** Discovery of unusual amounts of weapons, explosives, or their components that would arouse suspicion in a reasonable person; or,
- **Sector-Specific Incident.** Actions associated with a characteristic of unique concern to specific sectors (such as the public health sector) with regard to their personnel, facilities, systems or functions.

Note: These activities are generally protected by the First Amendment to the United States Constitution and should not be reported in a SAR, absent articulable facts and circumstances that support suspicion that the behavior observed is not innocent, but rather reasonably indicative of criminal activity associated with terrorism, including evidence of pre-operational planning related to terrorism. Race, ethnicity, national origin, or religious affiliation should not be considered as factors that create suspicion (although these factors may be used as specific-involved person descriptors).

SOURCE: Department Manual Section 1/590, *Reporting Suspicious Activity Potentially Related to Foreign or Domestic Terrorism* and Section 4/271.46, *Reporting Suspicious Activity Potentially Related to Foreign or Domestic Terrorism*.

B. NSI Suspicious Activity Reporting Indicators and Behaviors, February 2016



Suspicious Activity Reporting Indicators and Behaviors

Tools for
Analysts and
Investigators

Behaviors	Descriptions
Defined Criminal Activity and Potential Terrorism Nexus Activity	
Breach/Attempted Intrusion	Unauthorized personnel attempting to enter or actually entering a restricted area, secured protected site, or nonpublic area. Impersonation of authorized personnel (e.g., police/security officers, janitor, or other personnel).
Misrepresentation	Presenting false information or misusing insignia, documents, or identification to misrepresent one's situation as a means of concealing possible illegal activity.
Theft/Loss/Diversion	Stealing or diverting something associated with a facility/infrastructure or secured protected site (e.g., badges, uniforms, identification, emergency vehicles, technology, or documents {classified or unclassified}), which are proprietary to the facility/infrastructure or secured protected site.
Sabotage/Tampering/Vandalism	Damaging, manipulating, defacing, or destroying part of a facility/infrastructure or secured protected site.
Cyberattack	Compromising or attempting to compromise or disrupt an organization's information technology infrastructure.
Expressed or Implied Threat	Communicating a spoken or written threat to commit a crime that will result in death or bodily injury to another person or persons or to damage or compromise a facility/infrastructure or secured protected site.
Aviation Activity	Learning to operate, or operating an aircraft, or interfering with the operation of an aircraft in a manner that poses a threat of harm to people or property and that would arouse suspicion of terrorism or other criminality in a reasonable person. Such activity may or may not be a violation of Federal Aviation Regulations.
Potential Criminal or Non-Criminal Activities Requiring Additional Information During Vetting <i>Note: When the behavior describes activities that are not inherently criminal and may be constitutionally protected, the vetting agency should carefully assess the information and gather as much additional information as necessary to document facts and circumstances that clearly support documenting the information as an ISE-SAR.</i>	
Eliciting Information	Questioning individuals or otherwise soliciting information at a level beyond mere curiosity about a public or private event or particular facets of a facility's or building's purpose, operations, security procedures, etc., in a manner that would arouse suspicion of terrorism or other criminality in a reasonable person.
Testing or Probing of Security	Deliberate interactions with, or challenges to, installations, personnel, or systems that reveal physical, personnel, or cybersecurity capabilities in a manner that would arouse suspicion of terrorism or other criminality in a reasonable person.
Recruiting/Financing	Providing direct financial support to operations teams and contacts or building operations teams and contacts; compiling personnel data, banking data, or travel data in a manner that would arouse suspicion of terrorism or other criminality in a reasonable person.
Photography	Taking pictures or video of persons, facilities, buildings, or infrastructure in an unusual or surreptitious manner that would arouse suspicion of terrorism or other criminality in a reasonable person. Examples include taking pictures or video of infrequently used access points, the superstructure of a bridge, personnel performing security functions (e.g., patrols, badge/vehicle checking), security-related equipment (e.g., perimeter fencing, security cameras), etc.
Observation/Surveillance	Demonstrating unusual or prolonged interest in facilities, buildings, or infrastructure beyond mere casual (e.g., tourists) or professional (e.g., engineers) interest and in a manner that would arouse suspicion of terrorism or other criminality in a reasonable person. Examples include observation through binoculars, taking notes, attempting to mark off or measure distances, etc.
Materials Acquisition/Storage	Acquisition and/or storage of unusual quantities of materials such as cell phones, pagers, radio control toy servos or controllers; fuel, chemicals, or toxic materials; and timers or other triggering devices, in a manner that would arouse suspicion of terrorism or other criminality in a reasonable person.
Acquisition of Expertise	Attempts to obtain or conduct training or otherwise obtain knowledge or skills in security concepts, military weapons or tactics, or other unusual capabilities in a manner that would arouse suspicion of terrorism or other criminality in a reasonable person.
Weapons Collection/Discovery	Collection or discovery of unusual amounts or types of weapons, including explosives, chemicals, and other destructive materials, or evidence, detonations or other residue, wounds, or chemical burns, that would arouse suspicion of terrorism or other criminality in a reasonable person.
Sector-Specific Incident	Actions associated with a characteristic of unique concern to specific sectors (e.g., the public health sector), with regard to their personnel, facilities, systems, or functions in a manner that would arouse suspicion of terrorism or other criminality in a reasonable person.

<http://nsi.ncirc.gov>

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