LOS ANGELES POLICE COMMISSION

REVIEW OF LOS ANGELES POLICE DEPARTMENT'S GANG ENFORCEMENT DETAIL STOPS WITH RECORDED SEARCHES AND RELATED MATTERS

Conducted by the

OFFICE OF THE INSPECTOR GENERAL

Inspector General

MATTHEW J. BARRAGAN

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REVIEW OF LAPD'S GANG ENFORCEMENT DETAIL STOPS WITH RECORDED SEARCHES AND RELATED MATTERS

I. EXECUTIVE SUMMARY

The Office of the Inspector General (OIG) conducted a comprehensive review of the Los Angeles Police Department's (LAPD or Department) Gang Enforcement Detail (GED) stops involving recorded searches and related matters.

The review examined a sample of documented GED stops involving searches to determine whether the Department consistently complied with its policies and procedures. It also built on the OIG's 2019 review which evaluated GED stops, collection of stop data, and recording of stops using officer-activated cameras. Further, the OIG made efforts to identify stops that officers failed to report during the review period. Finally, the OIG also interviewed current and former GED officers and supervisors to better understand the unit's mission, priorities, tactics, and operational practices.

The OIG made the following findings and recommendations:

Finding: GED officers did not consistently comply with the Department's pretextual stop policy, and the Department does not require officers to document the articulable information supporting an extended or expanded stop.

> This report presents findings concerning pretext stops conducted by GED officers. The OIG provides these findings to inform the Board of Police Commissioners (BOPC), the Department, and the public pending presentation of the OIG's forthcoming report.
>
> For that review, the OIG conducted a separate review of a sample of traffic stops conducted throughout the Department in January 2026. The sample included stops conducted by officers in various assignments and was designed to assess compliance with the Department's pretext stop policy and other applicable traffic stop policies.
>
> The report, "Review of LAPD's Implementation of its 2022 Pretextual Stop Policy in Traffic Stops," is scheduled for presentation to the BOPC later in September 2026.

Finding: GED officers did not consistently obtain informed and voluntary consent to search. Officers did not always ensure that consent was clearly expressed, that the detainee understood the request, or that the detainee was advised of the right to withdraw consent at any time.

> **Recommendation 1:** Establish a process to monitor compliance with the Department's consent-to-search policy by identifying, tracking, and analyzing instances of noncompliance. Ensure that consent-to-search deficiencies are documented and promptly addressed.
>
> **Recommendation 2:** Update consent-to-search training to address the compliance issues identified in this audit and reinforce officers' understanding of the Department's policy and the constitutional principles governing voluntary consent searches.

Report back to the BOPC on plans for implementation of recommendations 1 and 2 within 21 days.

Finding: GED officers did not consistently activate their Body-Worn Video (BWV) or Digital In-Car Video (DICV) as required by Department policy.

> **Recommendation 3:** Require each Area to conduct inspections of officer-initiated stops to assess compliance with BWV and DICV activation requirements and to identify opportunities for improvement.

Finding: When GED officers photographed suspected gang members or gang associates, most photographs reviewed were taken in a manner inconsistent with Department policy. The policy also lacks clear standards governing the storage, security, handling, and sharing of Gang Photo Books and any electronic systems used to maintain or index them.

> **Recommendation 4:** Evaluate whether the Department should continue authorizing officers to take consensual photographs of suspected gang members or gang associates.

> **Recommendation 5:** Amend Department policy to establish requirements governing the storage, security, handling, and sharing of Gang Photo Books and any electronic systems used to maintain or index them.

Finding: GED officers did not consistently document all detained individuals in the Automated Field Data Report (AFDR). As a result, the Department underreported both the number of detentions and the enforcement actions taken. Additionally, GED officers inaccurately documented in the AFDR that detained individuals were subject to "curbside detention" when that action did not occur.

> **Recommendation 6:** Issue a reminder to sworn personnel assigned to field assignments to comply with the Department policy governing completion of Automated Field Data Reports, consistent with the Officer AFDR Completion Guide.

Finding: GED officers did not consistently offer detained persons a Department business card, as required by Department policy.

> **Recommendation 7:** Issue a reminder to all sworn personnel to comply with Department policy requiring officers to offer a Department business card to any detained person who is released without being booked or cited.

II. BACKGROUND

Several factors prompted the OIG's review of GED stops involving searches. First, this review serves as a follow-up to the OIG's 2019 audit of GED stops. That audit examined three reforms under the 2001 federal Consent Decree: management of gang units, collection of stop data, and recording of stops using officer-activated cameras. Those reforms followed the Rampart corruption scandal, which exposed significant deficiencies in the oversight of the Department's gang units (CRASH[1]) and contributed to the U.S. Department of Justice's finding of a pattern or practice of misconduct within the LAPD.

Second, in 2023, the Department identified unreported stops by GED officers assigned to two Community Police Stations. Those stops involved law enforcement actions, including searches, that officers failed to document as required.[2]

A. LAPD Gang Enforcement Detail Overview

Department training materials define a gang as: "*an ongoing, organized association or group of three or more persons, whether formal or informal, having as one of its primary activities the commission of one or more of the criminal acts enumerated in Penal Code § 186.22 subdivision e, having a common name or common identifying sign or symbol, and whose members collectively engage in, or have engaged in a pattern of criminal activity*."[3] According to Department training materials, the City of Los Angeles has approximately 35,000 to 40,000 gang members associated with more than 450 street gangs.

Each of the 21 LAPD Office of Operations (OO) Areas in the Department's four geographic bureaus has a GED unit. GED is the Department's "*primary uniformed component focusing on gang members and associated crimes*."[4] The Department has approximately 300 GED officers across the 21 Areas. According to Department training materials, GED units are responsible for gathering gang-related intelligence, identifying patterns of and monitoring gang activity, and conducting gang-related crime suppression. GED assigned activities include but are not limited to:

- Keeping a visible presence in communities affected by gangs and gang-related narcotics trafficking, and deploying to locations where gang crime is likely to occur;

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[1] The term CRASH stood for Community Resources Against Street Hoodlums.

[2] *See* Los Angeles Times article: *"LAPD Gang Officers Under Investigation for Actions in Traffic Stops, sources say,"* published August 24, 2023. Available at https://www.latimes.com/california/story/2023-08-24/lapd-mission-gang-officers-under-investigation

[3] LAPD Gang Awareness Basic Expanded Course Outline, June 2022.

[4] Special Order No. 7 (2004), "Gang Impact Teams – Established," Los Angeles Police Department, February 25, 2004.

- Monitoring parks, school yards, and other publicly accessible areas where gang members are known to congregate;
- Collecting and maintaining gang intelligence;
- Developing and maintaining relationships with individuals and organizations which may be impacted by gang crime; and,
- Participating in meetings related to gangs and gang crime.[5]

B. Stop Documentation Requirements

To comply with the Consent Decree, the Department began collecting stop data in 2004 through its Portable Officer Data Device System (PODDS).[6] Because PODDS provided limited capability to analyze stop data in the aggregate, the Department implemented an Area-level automated reporting system in 2009 known as the Field Data Report (FDR). Although the FDR collected less information than PODDS, it provided sufficient data to satisfy compliance with the requirements of the Consent Decree. The stop data collected included the number of persons stopped by race/ethnicity and gender, a checkbox indicating whether any type of "post-stop activity" had taken place, and fields for associated booking or other reference numbers.

The Department implemented a new system – Automated Field Data Report (AFDR) – to collect and maintain reportable data and allow supervisors to perform basic analyses of the number, types, and locations of stops conducted by their officers. As noted in previous OIG reports, the AFDR lacked detailed information on the actions taken during a stop, or the associated justifications for those actions. This made it difficult to thoroughly review officers' decision-making during stops.

In 2015, California enacted Assembly Bill 953 — the Racial and Identity Profiling Act (RIPA) — which requires law enforcement agencies to collect detailed data on most detentions and submit the information to the California Department of Justice. The law also mandates that officers document consensual encounters involving a search.[7] As an agency with 1,000 or more officers, the LAPD was required to — and did — begin collecting and reporting this data to the State by July 1, 2018.

RIPA required the Department to expand on the data previously collected during stops and searches of individuals. The new State-mandated reporting now requires the collection of up to

[5] Special Order No. 7 (2004), "Gang Impact Teams – Established," Los Angeles Police Department, February 25, 2004.

[6] The Portable Officer Data Device System was an automated system which included internal logic that assisted in improving stop data collection accuracy /completeness.

[7] The law exempts certain types of detentions and searches. For a full description, see the Stop Data Regulations Promulgated by the Office of the Attorney General at https://oag.ca.gov/ab953/regulations.

43 data elements for each individual detained or searched, which is significantly more than the 11 data elements collected in the pre-RIPA version of the AFDR.[8]

In addition to the required RIPA stop data collected through the AFDR, Department policy also requires officers to activate Body-Worn Video (BWV) and Digital In-Car Video (DICV) prior to each stop.[9,10] Additionally, Officers are required to broadcast or manually update their location and Unit Status to "Code Six" when at the scene of a stop;[11] and each stop is required to be documented on the Officers' Computer Aided Dispatch (CAD) Summary report. These policies are intended to ensure that LAPD stops are accurately documented and reported.

III. OIG REVIEW

A. Department-wide sample of 2023 GED stops with searches

The OIG's preliminary work included reviewing relevant Department policies and procedures; obtaining data and other records from the Department; attending the two-day Gang Intervention Introduction Training and the five-day Basic Gang Awareness School; interviewing Department subject-matter experts; and reviewing prior audits and reports.

Using the AFDR database, the OIG selected a random sample from the population of 2,960 GED stops reported during May 2023 (1,496 stops) and September 2023 (1,464 stops), that involved a search (pat-down, person, and/or property).[12] The OIG selected these months because the Department conducted extensive policy-compliance training for all GED officers in August 2023, allowing the review to assess stops both *before* and *after* the training.[13]

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[8] Special Order No. 11 (2018), "Field Data Reports/Completion and Tracking," June 26, 2018.

[9] Department Manual Volume 3, "Management Rules and Procedures," Section 579.15, "Objectives of Body Worn Video."

[10] Department Manual Volume 3, "Management Rules and Procedures," Section 579.13, "Digital In-Car Video System, Use and Deployment."

[11] Department Manual Volume 4, "Line Procedures," Section 120.40, "Codes and Phrases."

[12] A pat-down search, also known as a frisk, is a limited physical search of a person's outer clothing to find weapons or dangerous items. It is conducted when an officer has "reasonable suspicion" that an individual is involved in criminal activity and is armed and dangerous. A person search is an officer's search of an individual, which can include physically searching their body or belongings. A property search is the examination of a person's home, vehicle, or business by officers to look for evidence of criminal activity.

[13] This review did not identify any notable differences in GED officers' actions or activity following the training.

The OIG reviewed a total of 300 stops — 150 from May and 150 from September.[14] Those stops involved 541 detained individuals: 269 in May and 272 in September.[15] For each stop, the OIG reviewed all available BWV and DICV recordings and compared them with the corresponding AFDRs and CAD Summary reports.[16] The OIG also reviewed other available records related to each stop, including arrest reports and crime bulletins.

The OIG reviewed and assessed each stop and search for compliance with Department policies and procedures pertaining to:

- stops/detentions,
- searches,
- BWV and DICV activation,
- photographing detainees,
- post-stop actions taken,
- documentation of the stop/incident, and
- other miscellaneous areas.

The OIG identified issues in the following areas:

- Compliance with the Department's pretext stop policy;
- Compliance with the Department's consent-to-search policy;
- Activation of BWV and DICV, particularly during pedestrian stops;
- Photographing detainees and maintaining Gang Photo Books;
- Inaccurate or missing data reported in AFDR; and
- Providing Department business cards to detained persons.

1. Pretext Stop Policy

Department Manual Section 1/240.06 Limitation on Use of Pretextual Stops, states:

> "***Pretext Stops Defined.*** *A pretextual or pretext stop is one where officers use reasonable suspicion or probable cause of a minor traffic code violation (e.g., Municipal Code or Health and Safety Code) as a pretext to investigate another, more serious crime that is unrelated to that violation.*

[14] The OIG judgmentally decided on a sample size of 150 for each month, 300 in total. This sample size may be considered somewhat large by some standards, but the OIG wanted its two randomly selected samples to include as many of the 21 Areas as possible, since "modus operandi" for GED stops could possibly vary considerably by Area.

[15] *See* Appendix A for detailed tables of the breakdown of the sample.

[16] The CAD Summary is each unit's contemporaneous electronic log, which replaced the handwritten Daily Field Activity Report (DFAR) in 2015. In order to close out or "dispo" each stop or other activity, officers write a brief text description of what occurred as well as the result. This is separate from the AFDR data, which is more structured and collects detailed data about each stop.

> ***Policy.***
>
> ***Use of Traffic/Pedestrian Stops – General –*** *Traffic or pedestrian stops made for the sole purpose of enforcing the Vehicle Code or other codes are intended to* ***protect public safety****. Therefore, officers should make stops for minor equipment violations or other infractions only when the officer believes that such violation or infraction significantly interferers with public safety.* […]
>
> ***Pretext Stops – Restricted.*** *It is the Department's policy that pretextual stops shall not be conducted* ***unless*** *officers are acting upon articulable information in addition to the traffic violation, which may or may not amount to reasonable suspicion, regarding a serious crime (i.e., a crime with potential for great bodily injury or death), such as a Part I violent crime, driving under the influence (DUI), reckless driving, street racing, street takeovers, hit and run, human or narcotics trafficking, gun violence, burglary, or another similarly serious crime. Such decisions should not be based on a mere hunch or on generalized characteristics such as a person's race, gender, age, homeless circumstance, or presence in a high crime location.*
>
> *Department personnel seeking one or more specific persons who have been identified or described in part by one or more of these characteristics may rely on them only in combination with other appropriate identifying factors.*
>
> ***Note:*** *The reason for all pretext stops, and the citations and warnings resulting from them, should be articulated on BWV and should include and officer's response to any questions posed by the individual stopped.* […]
>
> ***Duration and Scope of All Stops.*** *Officers' actions during all stops (e.g., questioning, searches, handcuffing, etc.) shall be limited to the original legal basis for the stop, absent articulable reasonable suspicion or probable cause of criminal activity that would justify extending the duration or expanding the scope of the detention. Officers shall not extend the duration or expand the scope of the detention without additional reasonable suspicion or probable cause (beyond the legal basis for the stop)."*

The OIG's review determined that of 300 stops involving 541 detained persons, GED officers indicated on the AFDR they initiated a pretext stop for 20% of the stops (60 of 300).[17] The OIG determined that of those 60 stops, officers met the standard of properly articulating or documenting the pretext for the stop in 56 (93%) of the stops. In the remaining four stops, officers articulated the pretext for the stop was based on the general characteristics of the location, in conflict with Department policy.

GED officers indicated on the AFDR they initiated a non-pretext stop for the remaining 240 of 300 stops. The OIG identified 22 stops reported as non-pretext that:

[17] The OIG reported the data for pretext stops based on the number of stops made under pretext, not number of persons stopped under pretext.

- were initiated for minor equipment violations,
- were extended (duration and scope) beyond the original legal basis of the stop,
- resulted in a search, and
- did not result in the issuance of a citation.

These indicators suggest the stop may have been inaccurately reported as non-pretext; however, they are insufficient to conclude that the stop was pretextual. Department policy permits officers to extend the duration or expand the scope of a detention when supported by articulable reasonable suspicion or probable cause. However, officers are not required to document that articulation on BWV, the AFDR, or the CAD Summary.

2. Consent to Search Policy

In each of these 300 stops reviewed, involving 541 detained persons, GED officers conducted a search — either of the detained person, their property, and/or their vehicle. The OIG determined that GED officers did not consistently obtain consent from detainees to conduct their searches, ensure that a person giving consent understood that the consent was voluntary, or advise a person that their consent may be withdrawn at any time.

Administrative Order No. 22, dated November 20, 2020, states the following:

> "*Officers may conduct a search in a limited set of circumstances. There are five basic lawful requirements to consent searches.*
>
> 1. *Consent was given (the person must give expressed or implied consent)*
>   a. *Express Consent – when a person responds to an officer's request for permission to search using words that reasonably indicated the person is agreeing to the specific request.*
>   b. *Implied Consent – when a person's actions, gestures or response sufficiently communicates permission to the officer's request to search. Failure to object or respond to an officer's request to search does not constitute implied consent.*
> 2. *Consent was given voluntarily*
>   a. *Authorization is given of one's own free will, absent any duress.*
>   b. *No threat promises or demand for consent were used.*
> 3. *Scope of consent (only search those places and/or things that the person gave consent to search)*
> 4. *Intensity of search (the search shall not be unduly intrusive and consent to search does not provide authorization to destroy or damage the thing being searched.)*
> 5. *Duration of search (the search shall not be unreasonable in length of time)*
>
> ***Note:*** *Remember, <u>at any time, the consenting person can modify the scope of the search or withdraw consent to search.</u>*
>
> *Consent may be obtained either in writing or verbally*."

During the 300 stops reviewed involving 541 detained persons, officers conducted 324 person or property searches (searches that went beyond a pat-down search).[18] Of those 324 searches, officers were required to obtain consent in 131 searches. The OIG determined that in those 131 instances, officers failed to obtain consent on 26 (20%) occasions.

Additionally, Department policy requires officers to ensure that a person giving consent understands that the consent is voluntary.[19] The OIG found that, in 107 (82%) of the 131 searches requiring consent, GED officers did not ensure that the detainee understood that they were voluntarily consenting to the search.

Finally, Department policy requires officers to advise a person that consent may be withdrawn at any time during the encounter.[20] As noted in the Consent Withdrawal Advisory table on the following page, officers failed to provide that advisement in 100 (76%) of the 131 searches requiring consent.

Tables – Data on Search Assessments
(See Appendix B for a detailed breakdown of all search-related results.)

Total Number of Searches				
	Person/Property Searches		**Total Searches Requiring Consent**	
May	175	70.9%	69	27.9%
Sept	149	58.2%	62	24.2%
Total	**324**	**64.4%**	**131**	**26.0%**

Subject Consent Required for Search						
	May		**Sep**		**Total**	
Yes	46	66.7%	47	75.8%	93	71.0%
No	22	31.9%	11	17.7%	33	25.2%
UTD*	1	1.4%	4	6.5%	5	3.8%
Total	**69**	**100.0%**	**62**	**100.0%**	**131**	**100.0%**

[18] "Personal Searches – Part I, The Pat Down Search," Training Bulletin Volume XXXVI, Issue 1, Los Angeles Police Department, February 2004, states that, "a pat-down must be based on s*pecific and articulable facts* that cause an officer to *reasonably suspect a detainee might be armed or dangerous."* Emphasis in original.

[19] Administrative Order No. 22, *Verbal Consent*, dated November 20, 2020, states that when obtaining verbal consent, officers shall record on BWV or DICV, "*confirmation of the person's understanding of the consent he or she has provided*."

[20] Administrative Order 22, *Verbal Consent,* dated November 20, 2020, states that for verbal consent, BVW or DICV shall capture an "*advisement that the person can refuse or withdraw consent to the search at any time, even after he or she has consented, and the search has begun*."

Subject Consent Obtained for Search						
	May		Sep		Total	
Yes - Verbal Consent	47	68.1%	46	74.2%	93	71.0%
Consent Implied	2	2.9%	4	6.5%	6	4.6%
N/A	1	1.4%	0	0.0%	1	0.8%
No Consent Obtained	18	26.1%	8	12.9%	26	19.8%
UTD*	1	1.4%	4	6.5%	5	3.8%
Total	**69**	**100.0%**	**62**	**100.0%**	**131**	**100.0%**

Consent Withdrawal Advisory						
	May		Sep		Total	
Yes	5	7.2%	13	21.0%	18	13.8%
No - Required	58	84.1%	42	67.7%	100	76.3%
UTD*	2	2.9%	3	4.8%	5	3.8%
N/A	4	5.8%	4	6.5%	8	6.1%
Total	**69**	**100.0%**	**62**	**100.0%**	**131**	**100.0%**

Consent Understood						
	May		Sep		Total	
Yes	7	10.1%	3	4.8%	10	7.6%
No - Required	56	81.2%	51	82.3%	107	81.7%
UTD*	2	2.9%	4	6.5%	6	4.6%
N/A	4	5.8%	4	6.5%	8	6.1%
Total	**69**	**100.0%**	**62**	**100.0%**	**131**	**100.0%**

* Due to a lack of video recording or audio, the OIG was unable to determine the information in these cases.

3. BWV and DICV Activation

The Department's BWV policy requires officers to activate their cameras "*prior to the initiation*" of the relevant investigative or enforcement activity, while the DICV policy requires activation "*during the initiation*" of certain activity including all vehicle stops and pedestrian stops (when practicable).[21] The Department's DICV policy states that officers may be precluded from complying with policy under "*exigent circumstances*," and that each exception will be evaluated on a case-by-case basis. The OIG found that the overall compliance rate for officers activating their BWV or DICV was low.

The OIG determined that the 300 stops required 716 officer BWV camera activations. Department policy requires officers to activate their BWV devices *prior to initiating any investigative or enforcement activity involving a member of the public* when involved in any

[21] LAPD Manual 3/579.13, "Digital In-Car Video System (DICV) Use and Deployment" and LAPD Manual 3/579.15, "Objectives of Body Worn Video."

vehicle or pedestrian stops. Of these 716 required activations, officers failed to activate their BWV camera immediately before any attempt to contact the vehicle driver, vehicle occupant, bicyclist, or pedestrian 27.8% of the time (199 of 716).

The OIG's sample of 300 stops required 280 DICV activations. Of these 280 required DICV activations, 167 (60%) were activated consistent with Department policy. In the remaining 113 of 280 (40%) required DICV activations, the OIG determined either the DICV system was not activated timely with no justification and/or DICV was activated late with no justification. However, the OIG opined that DICV activation would have been feasible.

4. Photographing Detainees and Maintaining Gang Books

GED officers are required to be familiar with all known gang members and associates within their assigned Area. Accordingly, GED officers have a clear interest in photographing gang members and gang associates and retaining these photographs for future reference.

Department Manual Section 4/269.60 Photographing Known or Suspected Gang Members, states:

> *"Gang officers, gang sergeants, and gang detectives shall adhere to the following guidelines when photographing a suspected gang member or gang associates:*
> *• Officers shall not use physical force or any other form of coercion in acquiring a photograph;*
> *• Officers shall request and receive permission from the individual prior to taking a photograph when that person is not being arrested or otherwise legally detained;*
> *• Officers shall not pose the individual with his or her name or Subject Identification Cards;*
> *• Individuals photographed shall be unrestrained and on public property (e.g., not handcuffed or in the back seat of a police vehicle);*
> *• Officers shall conduct the photographing process contemporaneously with the completion of the FI;*
> *• Photographing may not extend the time necessary to complete the interview process; and,*
> *• A full explanation shall be provided to the individual as to the purpose of the photograph.*
>
> ***Security of Gang Member/Associate Photographs.*** *Gang Photo Books shall only be maintained by gang units and shall be secured at all times. Gang Photo Books are an important tool in the investigation of gang-related crimes and differ from regular photo or mug books in that they are assembled by gang and not by criminal offense. Gang Photo Books are considered part of the Department's hard-copy gang files. Gang*

> *officers shall follow the same security measures with respect to protecting gang member and associate photos as exercised for the Cal/Gang System and the hard-copy files.*[22]
>
> ***Note**: An automated database is permitted to be used as an index for the Gang Photo Books, consisting only of the gang member(s)/associate(s) name, Cal/Gang number, moniker and Gang Photo Book page number. If an automated database is used, a copy of the printed index shall be attached to the index portion of the Gang Photo Book. All prior printing conditions apply if this index is printed out."*

This review found that, of the 541 people detained, 36 (6.7%) were photographed. Additional details are summarized below:

- Six of the 36 detainees were photographed in compliance with policy, in that consent to photograph was received by the detainee without coercion and detention was not unnecessarily prolonged.

- Thirty of the 36 detainees (83.3%) were photographed in conflict with policy:

  - Fourteen of 30 detainees were handcuffed when photographed
  - Eight of 30 detainees were coerced by threat of enforcement activity
  - Eight of 30 detainees were photographed without consent requested or permission given.

The following two examples from this review, describe GED officers taking photographs of detainees, in conflict with Department policy:

> GED officers ordered three male subjects from their vehicle and directed them to stand on the sidewalk, unhandcuffed. Officers completed Field Interview cards (FI cards)[23] on each detainee and searched the vehicle with consent. One officer ordered each subject to face the camera to take their photograph, but the subjects objected. The officer stated, *"We're a gang unit, we're doing what we got to do. We can play the game, and give*

[22] CalGang is a statewide, law-enforcement-only gang-intelligence database maintained by the California Department of Justice. Its official purpose is to provide "an accurate, timely, and electronically generated database of statewide gang-related intelligence information" for criminal investigations. Data fields can include identifying information (photo, physical description, tattoos), alleged gang affiliations or associations ("member" or "associate"), known associates, addresses, vehicle information, prior contacts/stops, etc. People may be added to the database based on where they live, who they associate with, tattoos or clothing, or even being in the "wrong place."

[23] An FI card is a form that officers may fill out when they interact with a person in the "field" (i.e., during patrol, traffic stops, pedestrian stops, or other street-level contacts) — even if that person is not arrested or cited. The card is used to document basic information and observations about the person: name, physical description, date/time and location of contact, and sometimes other data like social media handles, phone number, email, plus any notes about what the person was doing or with whom they were associating. The purpose of the FI card is to "memorialize" what was said or observed during the encounter and to create a record of individuals who might be helpful later in investigations (e.g., as witnesses, suspects, or persons of interest).

> *tickets, take the car, and all that."* Ultimately, each detainee submitted to their photograph being taken to avoid enforcement actions.
>
> GED officers detained five possible gang members for open containers of alcohol, trespassing investigation, and odor of contraband. Four of the five detainees were handcuffed, and FI cards were completed for each detainee. Officers then took each suspect aside and ordered them to roll up their sleeves, lift their shirts, and pull up their pants legs while the officer took photographs of their faces and all tattoos.

In June 2020, the former Chief of Police issued a notice to all Department personnel placing a moratorium on all entries and use of the CalGang System.[24] This Notice did not reference the existing policy on photographing detainees or maintaining gang books. Based on the cases reviewed, inconsistencies appear to exist in how GED officers understand or apply the Department's policy regarding photographing suspected gang members or gang associates.[25]

Additionally, the Department's policy lacks clear guidance on the storage and security of physical Gang Photo Books, or any automated database used to index them. The policy also does not address the sharing of gang-related photographs outside of individual gang units.

5. Inaccurate Data Reported in AFDR

As previously stated, Department policy and State law requires a substantial amount of data to be recorded for each stop on an AFDR and subsequently reported to the California Department of Justice. The Department created the "Officer AFDR Completion Guide" to assist officers to accurately complete AFDR entries. Some key AFDR data includes:

- Officers' perception of each person detained – including their age, gender, and race
- reason for the stop
- reason for any searches
- whether the stop was pretextual
- all force and non-force actions taken during the stop
- overall outcome of the stop[26]

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[24] On June 19, 2020, the LAPD announced per a Notice from the Chief of Police that LAPD placed a moratorium on all entries and use of the CalGang System. This was in response to an internal review that revealed widespread inconsistencies and misuse of the database — including "false information" entered by officers that wrongfully identified people as gang members or gang associates.

[25] In our communications with the Department regarding the issue of GED officers taking photographs of subjects and keeping the photographs in Gang books, the Department concurs that confusion exists regarding the permissibility of taking photographs and maintaining gang books. Command staff stated that they are focusing on providing notification and clarification, as well as additional training to officers on current Department policies regarding photographs. Additionally, the Department has created a working group to develop best practices and any required policy changes, especially considering the utilization of current technology such as BWV.

[26] *See* Appendix C for further details on the data collected in the AFDR.

The OIG found AFDR accuracy and completion rates to be reasonably high, given the large amount of data required for each stop and the requirement to promptly complete each AFDR before transitioning to the next contact. However, the OIG identified the following inaccuracies:

- The "Officer AFDR Completion Guide," defines a "curbside detention," as "*any instance where a person was directed to sit on the sidewalk, curb, or ground.*" The OIG determined that GED officers incorrectly indicated "curbside detention" as an action taken for 192 of the 541 (35.4%) detained persons involved in the 300 stops. All 192 detainees were allowed to stand next to a vehicle or wall/fence, and none were ordered to sit on the sidewalk, curb, or ground.

- Department policy requires officers to complete an AFDR entry for every person detained or searched.[27] In this review, the OIG identified 61 detained individuals (of the total 541 detainees) whose detentions were not documented in an AFDR. Accordingly, the LAPD underreported the number of people detained and the enforcement activity taken against those 61 detainees.

The following summary details an incident in which GED officers failed to report the detention and activity taken on an individual associated with other detainees:

> GED officers initiated a vehicle stop and reported the enforcement activity taken in reference to the driver and passenger, however, GED officers failed to include in their AFDR the third person associated with the stop. The detainee was contacted just prior to the detention of two individuals in the vehicle. During the two-minute buffer portion of the BWV (no audio captured during buffer), the detainee is viewed lifting his shirt while talking to one of the officers. The OIG was unable to determine what verbal communication was exchanged and if consent for the person search was required.

6. Offering Business Cards to Detainees

Department policy requires officers to offer to provide a Department business card (i.e., employee identification cards with current rank, name, serial numbers, and Area) to detained persons.

Department Manual Section 4/296.01, Business Cards - Detainee Released Without Being Booked or Cited, states:

> *"When any person detained by an employee of this Department is subsequently released without being booked or cited, the responsible officer shall explain the reason for the detention. Prior to the person's release, the officer shall offer to provide the detained person an official Department business card, and if requested, provide the business card complete with the officer's name and the division of assignment."*

[27] Department Manual Volume 4, Section 202.02 "Automated Field Data Reports/Completion and Tracking."

Of the 541 persons detained, officers were required to offer a Department business card to 482 individuals (89%). The OIG found that officers offered a business card in 13 of those 482 encounters, resulting in a compliance rate of 2.8% and a noncompliance rate of 97.2%.

B. Search for Unreported Stops by GED Officer

In 2023, stops conducted by GED officers in two Areas were identified as unreported and involved law enforcement actions, including searches, in conflict with Department policy.

This objective sought to identify any unreported stops by GED officers during the review timeframe, by utilizing the Department's information systems. The OIG retrieved GED inputted data, Department-wide, through Evidence.com, AFDR, and Gold Mine[28] from May and September of 2023. A detailed description of the OIG's process to undertake this search can be found at Appendix D.

Of the 10,469 BWV and DICV videos reviewed, the OIG identified eight (0.08%) videos related to six incidents which possibly should have been documented on an AFDR. A summary of each of the six incidents can be found at Appendix E.

C. GED Officer Interviews

With Los Angeles Police Protective League (LAPPL) consent and assistance from OO, the OIG invited former and current GED officers and supervisors to participate in an interview via a notice on the Department's Local Area Network and through word of mouth.

The OIG ultimately interviewed 16 current and former GED officers and supervisors from the rank of Police Officer II through Captain. The interviews were semi-structured, allowing for open-ended discussion around key topics rather than adhering to a fixed list of questions. Key topics discussed included:

- self-directing GED activity
- recovering guns
- gathering and sharing gang intelligence
- recruiting, selecting, and retaining GED officers
- solving gang-related crime via expertise and specific knowledge
- collaborating with patrol officers and bureau gang coordinators
- complying with policies pertaining to stops and searches of suspected gang members
- supervising and leading GED officers.

[28] Gold Mine is a sub-application found within the Incident Tracking system used to query calls for service allowing for the production of incident history data indices or reports based on the selected data points.

1. Summary of Interview Findings

The OIG conducted voluntary interviews with 16 current and former GED officers and supervisors. Those interviews identified several recurring themes and inconsistencies in the operation of GED units. The most significant are summarized below:[29]

- Although gathering gang intelligence is the Department's primary expectation of GED officers, some interviewees reported feeling equally encouraged to recover firearms because firearm recoveries are among the first performance measures reported to Department leadership. Additionally, recognition by peers and supervisors for firearm recoveries contributes to this encouragement.

  Note: During two site visits to Area stations, OIG staff observed whiteboards in GED work areas or supervisory offices tracking firearm recoveries.

  Officer L, a current gang detective stated: "*Consequently, if guns are recovered, recognition from peers or possibly a formal commendation*."

- GED officers are expected to maintain extensive knowledge of gangs, their members, and their associates within their assigned Areas. Building trust with gang members is important and occurs through effective communication and appropriate interactions. The relationships GED officers have with gang members and their associates, assist significantly in solving crimes.

- Some GED units work collaboratively with patrol units by regularly attending the patrol roll call meetings and assisting as back-up to calls for service. However, some other GED units rarely attend the patrol roll call meetings, share information, or assist patrol officers in the field. There is prestige attached to being a GED officer in comparison to a patrol officer and gang officers often gain more respect and access to training opportunities.

- GED officers are confused by the changes to the Department's pretext stops and consent-to-search policies and inconsistently apply them in the field. Due to the confusion, officers avoid initiating pretext stops and complying with the requirements to obtain consent to conduct a search feel robotic and uncomfortable.

  Officer H, a former GED officer stated: *"it [pretext policy] definitely I think dissuades officers from making pretext stops because it seems punitive. That's the perception. It seems like if they're writing an order about this, they probably don't want us to do it."*

- GED officers are frustrated with the moratorium on access to the CalGang System and with its absence, believe there is no effective and efficient way to maintain, share, and access gang-member intelligence.

[29] *See* Appendix F for additional information resulting from the interviews.

Officer C, a former gang support division detective, stated: *"Calgangs was considered an intelligence database. And by taking it away it took away the only repository we had for gang intel that was approved. And nothing was put in place to take its place.…the last thing that was sent out by the Department was an email reminding everybody not to create their own databases because you're not allowed to."*

- GED officers reported concern with the lengthy administrative review process to place qualified officers in a GED unit and frustration with instances where less qualified officers are selected based on personal connections or organization diversity goals. Once in a GED unit, impact on an officer's personal life can be significant due to the work hours and dangerous nature the role involves.

- Most interviewees expressed frustration with the standard GED officer "tour" (i.e., term) of three years, as a GED officer's detailed and specific gang knowledge is "lost" with their departure. Interviewees suggested that the current tour limit is not a cost-effective or efficient practice and primarily benefits the gang members themselves, who do not want to be known by experienced GED officers.

IV. FINDINGS AND RECOMMENDATIONS

Based on its findings in this report, the OIG recommends that the BOPC direct the Chief of Police to implement the recommendations outlined below.

Finding: GED officers did not consistently comply with the Department's pretextual stop policy, and the Department does not require officers to document the articulable information supporting an extended or expanded stop.

This report presents findings concerning pretext stops conducted by GED officers. The OIG provides these findings to inform the BOPC, the Department, and the public pending presentation of the OIG's forthcoming report.

For that review, the OIG conducted a separate review of a sample of traffic stops conducted throughout the Department in January 2026. The sample included stops conducted by officers in various assignments and was designed to assess compliance with the Department's pretext stop policy and other applicable traffic stop policies.

The report, "Review of LAPD's Implementation of its 2022 Pretextual Stop Policy in Traffic Stops," is scheduled for presentation to the BOPC later in September 2026.

Finding: GED officers did not consistently obtain informed and voluntary consent to search. Officers did not always ensure that consent was clearly expressed, that the detainee understood the request, or that the detainee was advised of the right to withdraw consent at any time.

Recommendation 1: Establish a process to monitor compliance with the Department's consent-to-search policy by identifying, tracking, and analyzing instances of noncompliance. Ensure that consent-to-search deficiencies are documented and promptly addressed.

Recommendation 2: Update consent-to-search training to address the compliance issues identified in this audit and reinforce officers' understanding of the Department's policy and the constitutional principles governing voluntary consent searches.

Report back to the BOPC on plans for implementation of recommendations 1 and 2 within 21 days.

Finding: GED officers did not consistently activate their Body-Worn Video (BWV) or Digital In-Car Video (DICV) as required by Department policy.

Recommendation 3: Require each Area to conduct inspections of officer-initiated stops to assess compliance with BWV and DICV activation requirements and to identify opportunities for improvement.

Finding: When GED officers photographed suspected gang members or gang associates, most photographs reviewed were taken in a manner inconsistent with Department policy. The policy also lacks clear standards governing the storage, security, handling, and sharing of Gang Photo Books and any electronic systems used to maintain or index them.

Recommendation 4: Evaluate whether the Department should continue authorizing officers to take consensual photographs of suspected gang members or gang associates.

Recommendation 5: Amend Department policy to establish requirements governing the storage, security, handling, and sharing of Gang Photo Books and any electronic systems used to maintain or index them.

Finding: GED officers did not consistently document all detained individuals in the Automated Field Data Report (AFDR). As a result, the Department underreported both the number of detentions and the enforcement actions taken. Additionally, GED officers inaccurately documented in the AFDR that detained individuals were subject to "curbside detention" when that action did not occur.

Recommendation 6: Issue a reminder to sworn personnel assigned to field assignments to comply with the Department policy governing completion of Automated Field Data Reports, consistent with the Officer AFDR Completion Guide.

Finding: GED officers did not consistently offer detained persons a Department business card, as required by Department policy.

> **Recommendation 7:** Issue a reminder to all sworn personnel to comply with Department policy requiring officers to offer a Department business card to any detained person who is released without being booked or cited.

V. DEPARTMENT RESPONSE[30]

INTRADEPARTMENTAL CORRESPONDENCE

August 27, 2026
1.11

TO: Office of the Inspector General

FROM: Chief of Police

SUBJECT: RESPONSE TO THE OFFICE OF THE INSPECTOR GENERAL'S REVIEW OF THE GANG ENFORCEMENT DETAIL STOPS

The Los Angeles Police Department (Department) received the 2026 Office of the Inspector General's (OIG) draft of the *Review of LAPD's Gang Enforcement Detail Stops with Recorded Searches and Related Matters*.

The review includes seven recommendations as follows:

1. Establish a process to monitor compliance with the Department's consent-to-search policy by identifying, tracking, and analyzing instances of non-compliance. Ensure the consent-to-search deficiencies are documented and promptly addressed.

2. Update consent-to-search training to address the compliance issues identified in this audit and reinforce officers' understanding of the Department's policy and the constitutional principles governing voluntary consent searches.

3. Require each Area to conduct inspections of officer-initiated stops to assess compliance with BWV and DICV activation requirements and to identify opportunities for improvement.

4. Evaluate whether the Department should continue authorizing officers to take consensual photographs of suspected gang members or gang associates.

5. Amend Department policy to establish requirements governing the storage, security, handling, and sharing of Gang Photo Books and any electronic systems used to maintain or index them.

6. Issue a reminder to sworn personnel assigned to field assignments to comply with the Department policy governing completion of Automated Field Data Reports, consistent with the Officer AFDR Completion Guide.

7. Issue a reminder to all sworn personnel to comply with Department policy requiring officers to offer a Department business card to any detained person who is released without being booked or cited.

[30] *See* Appendix G for a copy of the correspondence dated October 21, 2024, referenced in the Department's response.

Department Response

The Department has reviewed the OIG's recommendations and remains committed to ensuring its policies, training, and oversight practices remain effective, transparent, and consistent with constitutional policing principles. This response states the Department's position on each recommendation, describes what the Department has done since the time this data was collected, and commits to future progress. The Department appreciates its ongoing collaboration with the OIG and the work that went into this analysis.

At the outset, it is important to note that this is not the first time the Department has reviewed OIG's work on this sample set. In September 2024, the OIG provided the Department preliminary findings from its review of these stops, covering six areas: video activation, pretext stops, Automated Field Data Report (AFDR) accuracy, consensual searches, general stop conduct and use of photographs. The Department responded in writing on October 21, 2024. The prior preliminary findings did not include formal recommendations or definitive conclusions, which the current report importantly adds.

Since the 2023 data sampling, the Department proactively implemented policy and procedural improvements in response to the identified concerns during the prior engagement. These actions included establishing quarterly Racial and Identity Profiling Act (RIPA) CompStat inspections, Audit Division (AD) assessments, Bureau-level Body Worn Video (BWV) and AFDR inspections, as well as Area-level inspections. RIPA CompStat, formerly conducted by the Director of the Office of Constitutional Policing and Policy, reviews accountability and compliance with pretextual stops and consent-to-search requirements. Additionally, AD began quarterly assessments of pretextual and non-pretextual stops and consent-to-search practices. Furthermore, over the past three years, the Department has implemented additional corrective actions (e.g., Office of Chief of Police (OCOP) Special Orders and Department Notices) that address some of the specific conduct identified in the current recommendations.

Recommendation No. 1 – the Department concurs in part/Prior action taken.

The Department is encouraged at the high level of compliance (93%) with the required articulation on the pretext stops; however, the unwarranted extensions of stops are problematic. Since the initial OIG analysis in 2024, the Department has established additional layers of oversight governing consensual searches, including Department policy and procedures, supervisory review, BWV, Digital In-Car Video (DICV), AFDR inspections, accountability, and constitutional policing training. The Department will continue to build upon these existing safeguards by incorporating additional consent to search review criteria into established inspections to identify compliance, reinforce policy requirements, and ensure deficiencies are documented and addressed appropriately. The Department will also evaluate formalization of supervisory review documentation within existing workflows to promote consistency, accountability, and transparency while minimizing unnecessary administrative burdens.

Recommendation No. 2 – the Department concurs/prior action taken.

The Department appreciates the acknowledgement in the report that Administrative Order No. 22 requires officers to confirm that the detained person understands the consent given and to advise that consent may be withdrawn at any time. Those are Department requirements that exceed Constitutional requirements, under which voluntariness is assessed on the totality of the circumstances and no advisement is required. The Department implemented this heightened requirement in 2020 to help ensure responsible use of consent searches. Clearly the OIG finding of low compliance with this mandate is concerning but the Department has leaned into this area this past year.

In June 2026, the Department conducted citywide training for all GED officers covering consent-to-search policies and procedures, consensual encounters, constitutional policing principles, legal updates, and procedural justice. The Department is incorporating additional guidance on consensual encounters and consent-to-search documentation into existing curricula, roll call training, supervisory briefings, and will host a Gang Officer Symposium at the end of 2026 to strengthen instruction in these areas.

Recommendation No. 3 – the Department concurs/prior action taken.

The 72% compliance rate with BWC and 60% compliance rate with DICV is lower than Department expectations. While not excusing this finding, it would be helpful to know whether there was any specific incident with no video available at all – complete compliance failure or whether these findings indicate that *some* officers activated *some* video system for every reviewed stop. Regardless, the Department values video evidence and has made efforts to strengthen compliance since the original sample time period.

On December 19, 2023, the Department implemented Special Order No. 19, *Notification Requirements For Traffic and Pedestrian Stops – Established,* which outlined BWV and DICV responsibilities for officers, supervisors and Area commanding officers. Training units were directed to provide necessary instruction on protocols and documentation. To ensure standardized inspection procedures for bureau BWV and DICV inspection units, the Department published the OCOP Notice, *Standardized Body Worn Video and Digital in Car Video Inspection Procedures – Revised,* dated July 9, 2024, which established evaluation procedures for both pretextual and non-pretextual stops.

Additionally, the Department is currently reviewing policy to enhance existing Area inspection protocols by incorporating additional evaluative measures designed to identify emerging trends, reinforce policy expectations, and ensure timely supervisory intervention when deficiencies are observed.

Recommendation No. 4 – the Department concurs/Prior action taken.

As acknowledged in the OIG report, consensual photographs of individuals believed to be gang members or gang associates remain a lawful and essential investigative resource that

supports criminal investigations, intelligence gathering, and officer safety. However, per Department policy, the expectation is that coercion is not employed and that the photographing does not extend a detention.

In 2024, the Department directed Gang and Narcotics Division to upload all gang photos to Axon's cloud-based platform Evidence.com rather than placing them in a gang book. The Division has subsequently addressed inconsistencies in the handling of gang-related photographs by revising its training and procedures. The Department will conduct a comprehensive evaluation of the continued use of consensual photographs, including the legal authority supporting their use and their operational necessity, prior to determining whether any policy revisions are warranted. Strategic Planning and Policies Division has an open and on-going project where they are collaborating with Gang and Narcotics Division to update Department policies and procedures on gang investigations and documentation.

Recommendation No. 5 – the Department concurs/Prior action taken.

The Department will review existing practices governing Gang Photo Books and associated systems to determine whether additional written guidance would improve clarity, standardization, and supervisory oversight. As previously indicated, all gang-related photographs are now uploaded and maintained within Axon's Evidence.com platform. Consequently, the means in which Gang Photo Books were utilized in 2023 differs significantly from current practices in 2026. This issue of Gang Photo Books are also part of the aforementioned open project with Gang and Narcotics Division to update gang investigation and documentation procedures.

Recommendation No. 6 – the Department concurs/Prior action taken.

Upon identification of this issue in the prior GED analysis, the Department implemented the Office of Operations Order No. 1 on July 9, 2024, Stops, Review Pilot Program: Stops Review Completion Guide, Form 15.45.00 – Activated, which provides detailed guidance to ensure accurate and complete documentation of stops. Completion of the AFDR is mandated by Department policy and is reinforced through supervisory review, audits and inspections. The Department will continue to provide additional guidance and remind personnel of the established AFDR completion requirements. It will maintain ongoing compliance monitoring through RIPA CompStat inspections, AD assessments, and Bureau and Area level audits.

Recommendation No. 7 – the Department concurs.

Department policy requires officers to provide business cards under specific circumstances. The high failure rate identified by OIG is inconsistent with Department expectations. To promote consistency and transparency in the application of this

requirement, the Department will issue roll call training to reinforce supervisory expectations and continue monitoring compliance through existing accountability mechanisms.

Again, the Department appreciates the OIG analysis and looks forward to future assessments to see whether the efforts to date and those commitments stated herein prove effective at remediating the policy inconsistencies. Since 2024, GED personnel have conducted thousands of enforcement contacts while adhering to a comprehensive accountability structure. This includes BWV, DICV, AFDR supervisory reviews, RIPA CompStat inspections, legal updates, Department policies, and ongoing training. Collectively they provide layered oversight and accountability, including the application of progressive discipline when appropriate.

Should you have additional questions regarding this matter, please contact Assistant Chief Emada E. Tingirides, Director, Office of Operations, at (213) 486-0100.

Respectfully,

JIM McDONNELL
Chief of Police

APPENDIX A

The two detailed tables below present the detainee sample data by Area and Race for both May and September. Note that these sample numbers and percentages are compared to the population numbers and percentages.

Total Subjects Detained during Stops with Searches
May and September of 2023

	May		Sep		Total	
	Sample	**Population**	**Sample**	**Population**	**Sample**	**Population**
Operations-Central Bureau	**130 (48%)**	**652 (44%)**	**148 (54%)**	**761 (52%)**	**278 (51%)**	**1,413 (48%)**
Central	0 (0%)	11 (1%)	0 (0%)	20 (1%)	0 (0%)	31 (1%)
Hollenbeck	0 (0%)	126 (8%)	18 (7%)	125 (9%)	18 (3%)	251 (8%)
Northeast	9 (3%)	34 (2%)	11 (4%)	44 (3%)	20 (4%)	78 (3%)
Newton	121 (45%)	430 (29%)	114 (42%)	503 (34%)	235 (43%)	933 (32%)
Rampart	0 (0%)	51 (3%)	5 (2%)	69 (5%)	5 (1%)	120 (4%)
Operations- South Bureau	**91 (34%)**	**488 (33%)**	**73 (27%)**	**373 (25%)**	**164 (30%)**	**861 (29%)**
77th Station	65 (24%)	186 (12%)	50 (18%)	201 (14%)	115 (21%)	387 (13%)
Harbor	0 (0%)	39 (3%)	0 (0%)	30 (2%)	0 (0%)	69 (2%)
Southeast	26 (10%)	96 (6%)	1 (0%)	33 (2%)	27 (5%)	129 (4%)
Southwest	0 (0%)	167 (11%)	22 (8%)	109 (7%)	22 (4%)	276 (9%)
Operations-Valley Bureau	**46 (17%)**	**275 (18%)**	**44 (16%)**	**236 (16%)**	**90 (17%)**	**511 (17%)**
Devonshire	6 (2%)	22 (1%)	3 (1%)	37 (3%)	9 (2%)	59 (2%)
Foothill	24 (9%)	100 (7%)	35 (13%)	108 (7%)	59 (11%)	208 (7%)
Mission	4 (1%)	90 (6%)	0 (0%)	10 (1%)	4 (1%)	100 (3%)
North Hollywood	2 (1%)	17 (1%)	2 (1%)	19 (1%)	4 (1%)	36 (1%)
Topanga	0 (0%)	7 (0%)	1 (0%)	29 (2%)	1 (0%)	36 (1%)
Van Nuys	0 (0%)	24 (2%)	0 (0%)	7 (0%)	0 (0%)	31 (1%)
West Valley	10 (4%)	15 (1%)	3 (1%)	26 (2%)	13 (2%)	41 (1%)
Operations- West Bureau	**2 (1%)**	**81 (5%)**	**6 (2%)**	**90 (6%)**	**8 (1%)**	**171 (6%)**
Hollywood	0 (0%)	23 (2%)	0 (0%)	21 (1%)	0 (0%)	44 (1%)
Olympic	0 (0%)	29 (2%)	6 (2%)	42 (3%)	6 (1%)	71 (2%)
Pacific	2 (1%)	5 (0%)	0 (0%)	17 (1%)	2 (0%)	22 (1%)
Wilshire	0 (0%)	24 (2%)	0 (0%)	5 (0%)	0 (0%)	29 (1%)
West Los Angeles	0 (0%)	(0%)	0 (0%)	5 (0%)	0 (0%)	5 (0%)
Community Safety Partnership Bureau	**0 (0%)**	**(0%)**	**1 (0%)**	**4 (0%)**	**1 (0%)**	**4 (0%)**
Department Total	**269**	**1496**	**272**	**1464**	**541**	**2960**

Total Subjects Detained by Race May and September of 2023 (from Sample)						
	May		**Sep**		**Total**	
Hispanic	137	50.9%	150	55.1%	287	53.1%
Black	87	32.3%	85	31.2%	172	31.8%
No Information[31]	37	13.8%	24	8.8%	61	11.3%
White	5	1.9%	2	0.7%	7	1.3%
Other	2	0.7%	10	3.7%	12	2.2%
Asian	1	0.4%	1	0.4%	2	0.4%
Total	**269**	**100.0%**	**272**	**100.0%**	**541**	**100.0%**

[31] "No Information" entries under the "Race" and "Gender" categories indicate that the Person was not entered in the AFDR. The data point is based on the Officer's perception and so therefore has been indicated accordingly.

APPENDIX B

The following six tables present additional search-related data.

Pat-Down Searches by Race						
	May		Sep		Total	
Black	75	34.2%	78	32.5%	153	33.3%
Hispanic	121	55.3%	137	57.1%	258	56.2%
White	5	2.3%	2	0.8%	7	1.5%
Other	2	0.9%	9	3.7%	11	2.4%
No Information	16	7.3%	14	5.8%	30	6.5%
Total	**219**	**100.0%**	**240**	**100.0%**	**459**	**100.0%**

Pat-Down Searches by Gender						
	May		Sep		Total	
Male	193	88.1%	213	88.7%	406	88.5%
Female	10	4.6%	13	5.4%	23	5.0%
No Information	16	7.3%	14	5.8%	30	6.5%
Total	**219**	**100.0%**	**240**	**100.0%**	**459**	**100.0%**

Search of Person by Gender						
	May		Sep		Total	
Male	40	78.4%	32	88.9%	72	82.8%
Female	4	7.8%	1	2.8%	5	5.7%
No Information	7	13.7%	3	8.3%	10	11.5%
Total	**51**	**100.0%**	**36**	**100.0%**	**87**	**100.0%**

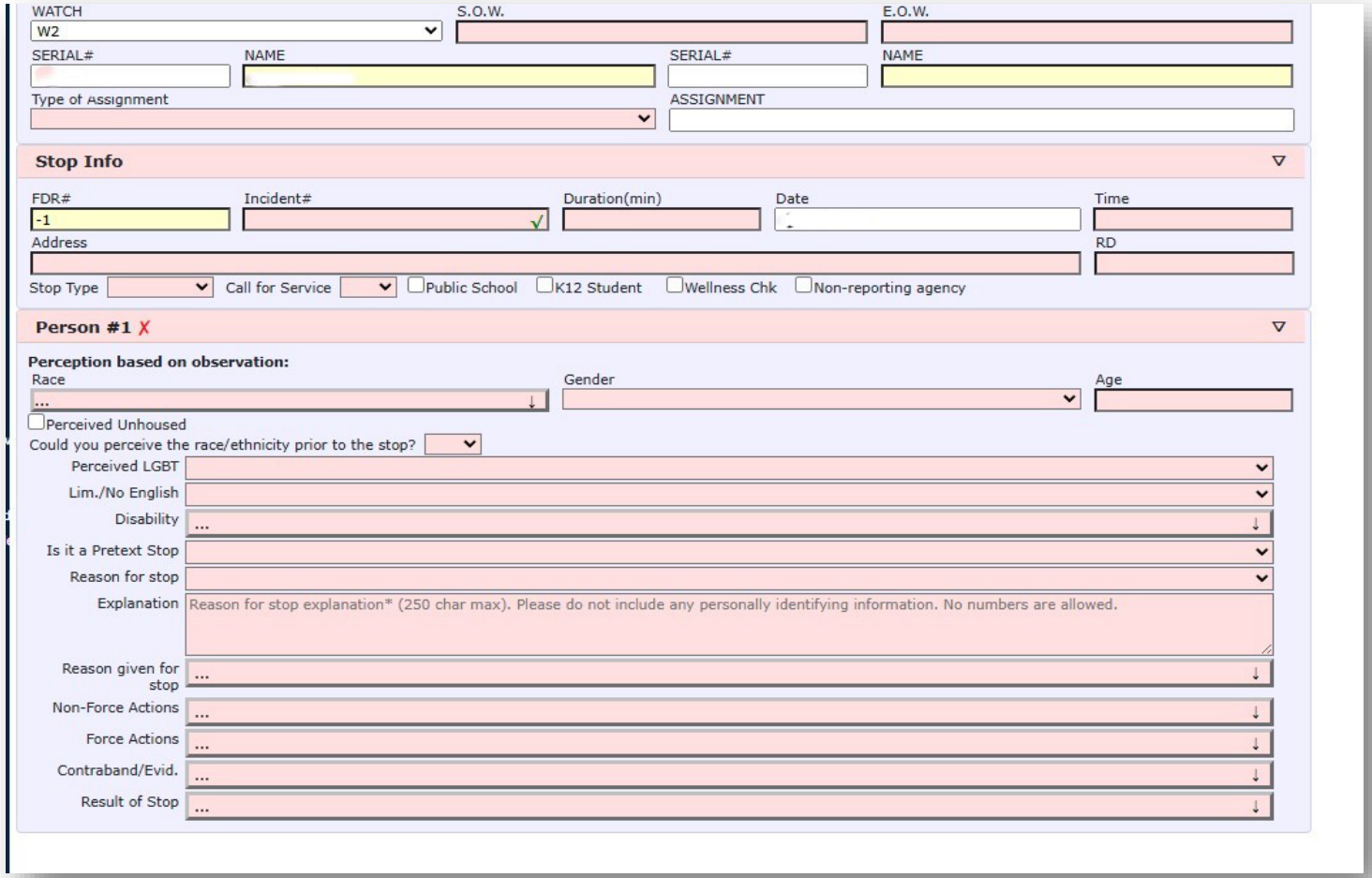
Search of Property by Race						
	May		Sep		Total	
Asian	0	0.0%	1	0.8%	1	0.4%
Black	56	38.4%	46	34.8%	102	36.7%
Hispanic	78	53.4%	74	56.1%	152	54.7%
White	3	2.1%	2	1.5%	5	1.8%
Other	2	1.4%	4	3.0%	6	2.2%
No Information	7	4.8%	5	3.8%	12	4.3%
Total	**146**	**100.0%**	**132**	**100.0%**	**278**	**100.0%**

Search of Property by Gender						
	May		Sep		Total	
Male	126	86.3%	115	87.1%	241	86.7%
Female	13	8.9%	12	9.1%	25	9.0%
No Information	7	4.8%	5	3.8%	12	4.3%
Total	**146**	**100.0%**	**132**	**100.0%**	**278**	**100.0%**

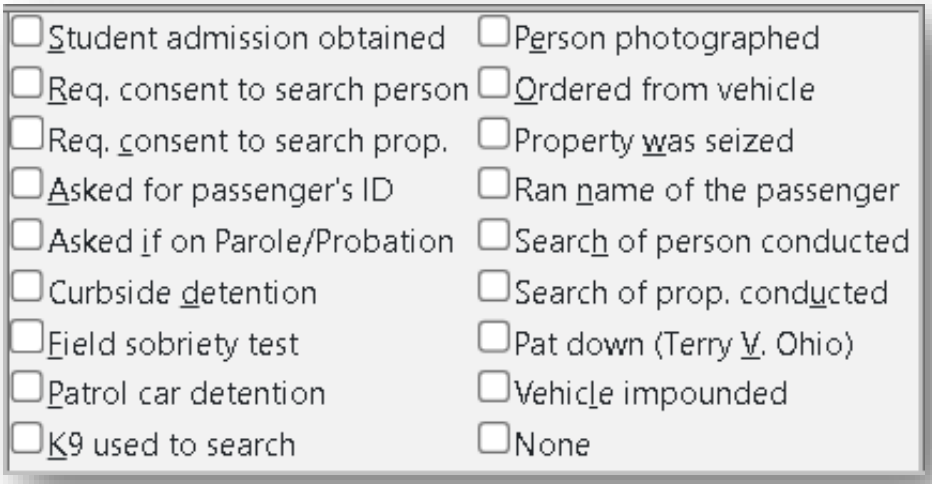
Property Searched						
	May		Sept		Total	
Vehicle - driver compartment	85	17.2%	92	16.9%	178	17.1%
Vehicle - passenger compartment	84	17.0%	89	16.4%	174	16.7%
Vehicle - glovebox	73	14.7%	88	16.2%	162	15.5%
Vehicle - center console	82	16.6%	98	18.0%	180	17.3%
Vehicle - Trunk	77	15.6%	81	14.9%	159	15.3%
Vehicle - Hood	1	0.2%	1	0.2%	2	0.2%
Vehicle - Frunk (Tesla / Electric Vehicle)	2	0.4%	1	0.2%	3	0.3%
Backpack	47	9.5%	39	7.2%	86	8.3%
Bag	34	6.9%	46	8.5%	80	7.7%
Purse	10	2.0%	8	1.5%	18	1.7%
Total	**495**		**543**		**1042**	

APPENDIX C

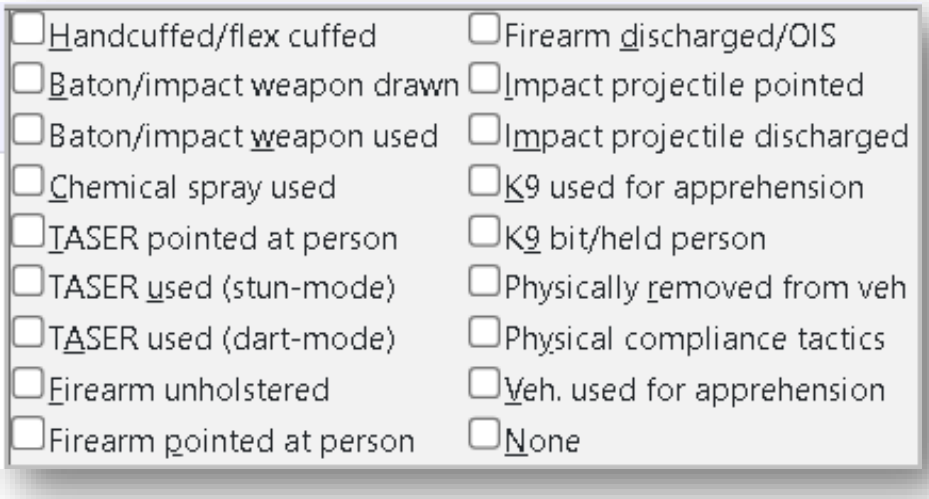
Blank AFDR



AFDR "Non-Force Actions" Drop-down Options



AFDR "Force Actions" Drop-down Options



APPENDIX D

Detailed Methodology for Search for Unreported Stops by GED Officer – Test work

The OIG retrieved data produced by GED Officers Department-wide through Evidence.com, their AFDRs, and Gold Mine[32] from May and September of 2023. For each officer, the OIG identified and extracted all body-worn video (BWV) and digital in-car video (DICV), which documented a start time that did not occur within five minutes of a start time recorded on an AFDR and an Incident Number.

This methodology yielded 10,469 videos (19.6% of all videos produced by GED[33]). The OIG tested 100% of these videos using the following attributes:

1. the video depicted evidence of law enforcement action being conducted on a member of the public;
2. where applicable, did not have the required accompanying BWV or DICV- whether video of the incident was absent in its entirety, or the activity referenced in attribute (1) was captured during the buffer, and;
3. is the BWV or DICV was not accompanied by an AFDR and/or CAD documentation.

The Department met the standards for this test of unreported stops if the video evidence did not contain any of the above noted attributes.

Due to the voluminous number of videos, we employed a method known as "Cascading Criteria" to streamline the evaluation of the three key attributes and to allow focus on the most critical attributes first, to reduce unnecessary testing and optimize the review process. Specifically, if Attribute 1 was not noted, then Attributes 2 and 3 were not tested. Similarly, if both Attributes 1 and 2 were not met, then Attribute 3 was not tested. This method ensured efficiency by testing attributes in a predetermined sequence.

[32] Gold Mine is a sub-application found within the Incident Tracking system used to query calls for service allowing for the production of incident history data indices or reports based on the selected data points.

[33] There were 56,401 videos (BWV and/or DICV) produced by GED Officers in May and September 2023.

APPENDIX E

Findings – Summary List for Testwork of Search for Unreported Stops by GED Officer

The following is a summary list of our testwork findings. All recordings originated from the front camera of a patrol vehicle's DICV system.

The DICV system is designed to capture activity occurring in front of and inside the rear passenger of the patrol vehicle. The system continuously records a one-minute buffer of video without audio. When the system is activated, it saves the buffer along with all new audio and video recording going forward. The video files listed below were automatically activated after 10 seconds of continuous activity from the patrol vehicle's lightbar and manually deactivated via button press.

Below is a summary of each of the recordings which possibly should have been documented on an AFDR.

FILE 201: During daylight hours, a 4 second plus 1-minute buffer recording captured a Central Area sergeant and police officer conversing with two subjects carrying professional recording cameras. The police officer can be seen holding two Department issued radios and both employees are making gestures towards the street and the park as they conversed with the subjects. A third person can be seen in the distance walking down a hill toward the group. The police officer and a male subject step out of the DICV's field of view as the light bar is activated. The recording was manually deactivated after four seconds.

FILE 202: Approximately an hour after FILE 201 and involving the same Central Area patrol vehicle as above, a 16 second plus 1-minute buffer recording captured the patrol vehicle parked on a residential road. After 42 seconds, the patrol vehicle's lightbar activates as the unit begins driving behind an orange sedan before coming to a stop in the number two lane at a red light behind the orange sedan.

The following observations were documented during the 16 seconds of audio that followed.

> The DICV is activated and a "chirp" from the Patrol Vehicle can be heard. The orange sedan repositions slightly towards the right.
>
> ***FEMALE OFFICER:*** *(Through the Patrol Vehicle Megaphone) "When the light turns green, I need you to … drive past the light, and pull to your right…do not make a right." (To Partner Officer) "Do you want me to turn it off?"*
>
> ***MALE OFFICER:*** *"Yeah"*
>
> ***FEMALE OFFICER:*** *"Top of [inaudible]"*
>
> ***MALE OFFICER:*** *"Just press the button. Yeah. No. That one."*

The DICV unit moves slightly as the deactivation button is engaged.

FILE 1502: During evening hours, a 1 second plus 1-minute buffer recording captured a Northeast Area patrol vehicle shining a light at a shirtless male subject before coming to a stop near the man. The DICV is activated for 1 second during which time someone can be heard saying *"ohhhh"*. The DICV is deactivated while the officer and subject appear to still be interacting.

FILE 3397: During daylight hours, a 4 second plus 1-minute buffer recording captured a 77th Street Area patrol vehicle stopped at a red light on a freeway off-ramp behind a red SUV. As both vehicles turned onto a business street, the patrol vehicle's light bar activates, and the red SUV pulls over. The windows on the red SUV were heavily tinted. The patrol vehicle stops next to the driver's side of the red SUV, and a male officer can be heard saying *"roll your window down."* The DICV is then manually deactivated.

FILE 3398: This video buffer is a continuation of File 3397, with the buffer video recording soon after deactivation. A 50 second buffer and 8 second recording captured the patrol vehicle remaining next to the red SUV for approximately 30 seconds. The patrol vehicle then drives away, coming to a stop at a red light, proceeding slowly into the intersection and negotiating a left turn onto another street while the light was still red. The DICV is then activated and the patrol vehicle can be seen traveling at a relatively high rate of speed, compared to surrounding traffic. No sirens were audible. The DICV is then deactivated soon thereafter.

FILE 4666: During evening hours, a 9 second plus 59 second buffer recording captured a Harbor Area patrol vehicle driving through alley ways and business streets. While at a red light, a subject can be seen walking a bike across the street. The patrol vehicle's lightbar is activated as they turn right and pull to the side of the street.

The following observations were documented during the 9 seconds of audio that followed.

> ***FEMALE OFFICER:*** [Inaudible] *... let me see your chest. I'm just making sure you don't have the tattoos. Okay you're good. Thank you.*
>
> ***MALE OFFICER:*** [Inaudible] *already?*
>
> ***FEMALE OFFICER:*** *Yeah she does.*

The sound of the patrol vehicle's door closing can be heard and the DICV is deactivated.

FILE 8721: During evening hours, a 42 second plus 1-minute buffer recording captured an Olympic Area patrol vehicle driving behind a black sedan through alleyways then onto a residential street. The black sedan pulls into a residential driveway and two male subjects exit the vehicle. The patrol vehicle's light bar is activated, and a light is shone on the two subjects. Both subjects proceed towards the driver side of the patrol vehicle. The DICV is activated at this time.

The following observations were documented during the 42 seconds of audio that followed.

> ***UNKNOWN MALE 1:*** [Inaudible]

MALE OFFICER: *Hold on*

FEMALE OFFICER: *[inaudible] plate* [inaudible] *car is* [inaudible].

UNKNOWN MALE 1: *hold on hold on*

UNKNOWN SPEAKER: *Are we good?*

MALE OFFICER: *Everything's fine* [name redacted].

FEMALE OFFICER: *Alright, you're good you're good you're good you're good. You're good!*

UNKNOWN MALE 1: *We're good?*

FEMALE OFFICER: *Yeah.* (The sounds/motions consistent with someone entering the patrol vehicle can be heard).

UNKNOWN MALE 1: [inaudible] *me real quick what happened* [inaudible] *my plate*

FEMALE OFFICER: *No we're good.*

UNKNOWN MALE 1: *Everything straight?*

FEMALE OFFICER: *Is he good?*

MALE OFFICER: *He's good.*

UNKNOWN MALE 1: [inaudible] *I have my new plates in the car, I just haven't put them on yet, that's my ninety-day paper plate.*

FEMALE OFFICER: *Okay*

UNKNOWN MALE 1: [inaudible]

MALE OFFICER: *William zero eight*

UNKNOWN MALE 1: *I can* [inaudible] *show you my brand new plate they just sent in the mail, I haven't put it on yet.*

FEMALE OFFICER: *Okay.*

UNKNOWN MALE 1: *Hold on let me grab it.* (Subject proceeds to his rear right passenger seat)

FEMALE OFFICER: *Cause that comes back to a Ford, it's a Honda. . . I don't know.* (The Patrol Vehicle inches forward and the DICV beeps). *What's your name?*

The DICV is deactivated.

FILE 10040: During evening hours, a 2 second plus 1-minute buffer recording captured a Wilshire Area patrol vehicle traveling on a residential street, then while stopped at a stop-sign intersection, a white sedan passes in the opposite direction. The patrol vehicle then negotiates a U-turn and proceeds down the street. A few seconds later, the white sedan is seen parked to the right. The patrol vehicle approaches the white sedan with lightbars activated. The driver of the white sedan exits the vehicle and approaches the trunk of the white sedan at which time the subject's attention is drawn to the passenger officer who is shining a light at the subject. The DICV activates and an officer can be heard saying, *"be careful, you were uh."* The DICV is then manually deactivated.

APPENDIX F

Additional information summarizing common themes and issues identified from the interviews.

Ability to Determine Activities Independently

Our interviews determined that there was wide variation between Areas as to whether a GED unit's daily activities were determined by, GED officers, GED sergeant, Gang Impact Team (GIT) Lieutenant, or Area Captain.

- Officer D, former GED officer, stated: "*Assignments really weren't handed out or given at that time…we just went out about the day pretty much without any guidance*."
- Officer L, a current gang detective, stated: "*It wasn't necessarily strictly self-directed it was partially self-directed… given experience and current trends, growing current gang crime trends, but also the direction would come from the supervisors*."

Firearm Recovery

A common theme reflected in the interviews was that although there was no evidence of a quota to recover guns, notoriety was given to GED officers when they did recover a gun.

- Officer L, a current gang detective, stated: "*Consequently, if guns are recovered, recognition from peers or possibly a formal commendation*."
  Officer N, a former senior lead officer in a gang detail, stated (in summary): GED officers are indirectly encouraged to recover firearms when the number of guns recovered is among the initial information reported to LAPD command staff.

  Note: During two of OIG's onsite interviews at Area police stations, OIG staff observed a white board in the GED area or supervisory office tracking the number of guns recovered.

Priority to Gather Gang Intelligence

This topic relates to the interviewee's perception of how important their Area's GED unit and/or its command placed on GED officers gathering gang intelligence. This would involve talking to people, whether it be gang members or others in the neighborhood, about gangs and gang members. A common theme identified is that gathering gang intelligence is a major priority of GED officers.

- Officer E, former GED lieutenant, stated: "… *it was a constant message to the gang officers. Our number one job is gathering gang intelligence*."
- Officer O stated: "… *intel is the priority … you get intel through getting guys with guns, stopping gang members who are likely to carry guns. But intel was the number one thing*."

Solving Gang Crime

A common theme reflected in the interviewees is that it is a GED officer's responsibility to know "everything" about each gang member of each assigned gang – including where a gang member lives, family members, what kind of dog they have, if they have a girlfriend, if they have kids, etc. If a GED officer receives a telephone call from an LAPD investigator in the middle of the night and is advised that a gang member in their Area has committed a crime, the GED officer is expected to identify the suspect based on a description or photo. A GED officer "passes the final exam" if they can identify the suspect or victim in a serious crime.

- Officer C, former stated (in summary): The "Final Exam" is a GED officer's ability to be able to determine who committed a crime based on the GED officer's knowledge of all the intel gathered about the gang members in their Area.
- Officer K stated, "*When GED officers cannot identify a gang member in their gang that just committed a crime, that is a failure*."

Gang Expertise/Localization of Experience/Specific Gangs

A common theme identified is that officers can build trust with gang members while also gathering intelligence during interactions. GED officers interact and communicate with gang members in a different way than other law enforcement personnel. GED officers want to build trust and a relationship with gang members with the goal to attain local gang expertise and mutual respect.

- Officer H stated: "*Sometimes if you have a positive rapport with that gang member, that can come into play later on, when there's a stressful situation with that person, they might trust you.*"
- Officer L stated: "… *it's about establishing the rapport. And that the way I like to phrase it, is establishing and nurturing relationships, because those relationships will pay dividends later*."

Relationship with Patrol

A common theme identified is that GED officers found it important to support patrol units and create a relationship with them and this was achieved by attending roll calls and providing back-up in the field.

- Officer A stated: "*I tried to always implement patrol into everything that I did. Especially if I was a team leader on something if I was the one coordinating what was happening today*."
- Officer B stated: "*I would attend patrol roll calls and brief them on the gangs and their activity. If there were any shootings, or gang calls, patrol would be ready to help with backup I would help patrol with tactical situations, and they would share information*."

Coordination with the Bureau Gang Coordinator

Note: The Bureau Gang Coordinator (Lieutenant II) reports directly to the Bureau Deputy Chief and is responsible for monitoring and assessing Gang Impact Team operations and gang compliance issues within their respective Areas. The Bureau Gang Coordinators are to monitor and assess the operation of all Gang Impact Teams within the bureau and conduct on-site inspections/reviews of Area GED operations.

A common theme identified is that GED officers are not familiar with who the Bureau Gang Coordinator is and/or what their role is amongst GED units in the Areas.

- Officer A stated: "*I didn't even know who it was, when I was working gangs*."
- Officer G stated: "*I didn't even know that it existed*."

Recruitment and Selection of GED Officers

A common theme identified from the interviews is that GED vacancies should be filled by qualified officers from within the Areas and be free from bias or favoritism. Interviewees added that the administrative review process to place qualified officers in a GED unit is lengthy.

Note: GED officer selection criteria and other policies related to the management of GED units were set, in large part, by the Consent Decree. Based on these policies, officers must undergo an application process to join a GED and must submit to financial disclosure.

Officers are generally limited to a term of three years in a GED (with a possible extension of up to two additional years), after which they must cycle out for at least a year.

- Officer I stated: "*And it's hard enough trying to get good people to work these gang units because most kids nowadays don't want to do this job… we get a lot of trouble trying to find people who want to come on this and then I think the administrative aspect of it makes it so much more harder for us to find quality people that want to do this job because I have guys who are quality that really want to do this job*."
- Officer O stated (in summary): GED officers should be selected based on interest and commitment, rather than personal connections, career advancement considerations, or management employment diversity goals.

GED Officer Term Limits

A common theme identified from the interviews is that term limits should not exist due to the amount of time it takes to become an expert in an Area's local gangs and gang members. Interviewees suggested that a five-year term limit may be more appropriate.[F-1]

- Officer A stated, "*Term limits are a problem. Term limits are not a good thing. You don't develop an expert in three years in a term, and at five at most with two one-year extensions, right? You'll never have an expert that way. That's not how that works, right? Our detectives at RHD and homicide are Bonafide experts in all this stuff, right? How long have they been doing those things for 20, 30 years?*"

Impact of GED Units on the Community

Interviewees shared that GED Officers must be technically and tactically proficient, while also consistently exercising interpersonal skills, cultural sensitivity, and a commitment to the community. A common theme identified is that reducing gang-related crime and combating the fear and intimidation created by criminal street gangs occurs when known gang members are arrested and jailed for a significant time.

- Officer L stated (in summary): The arrest of a known, violent gang member for a serious crime resulting in lengthy jail time, positively impacts the community.
- Officer O stated (in summary): Gang members engage in counterintelligence and surveillance tactics, including faking possession of a firearm during pedestrian stops to observe officers' reactions and assess how far they can challenge or evade enforcement actions.

Information Sharing

Interviewees explained that the absence of the CalGang System has been detriment to GED officers as they have nowhere to maintain or share gang-member information.

Note: In 2020, LAPD permanently withdrew from the CalGang program after an internal review uncovered significant misuse of the gang-tracking database by LAPD personnel, including entry of false information. Prior to this moratorium of LAPD from the CalGang program, this was one of the most effective ways for officers to share information about gang members with each other.

[F-1] After the 2001 LAPD consent decree, the U.S. Department of Justice (DOJ) required a number of reforms aimed at reducing corruption, excessive force, and lack of oversight—particularly within specialized units like Gang Enforcement Details (GEDs), where many of the abuses had occurred. The DOJ opined that rotation promotes accountability, oversight, and integrity—key goals of the consent decree. The LAPD implemented term limits on gang enforcement officers because keeping the same people in the same high-risk, high-discretion units for too long increases the risk of corruption, misconduct, and insular culture.

- Officer C, former gang support division detective, stated (in summary): Withdrawal from the CalGang System has created a void for capturing and sharing information on gang members.
- Officer G, current GED officer, stated, "…*to be given more tools that they can do to do their job efficiently, like access to CalGang*." "…*it's frustrating at times that they don't have enough tools to do the job they need to do, especially in the specialized units such as Gang Enforcement Details*."

Appeal to be Assigned to a GED

Interviewees explained that there was prestige attached to being a GED officer compared to a patrol officer.

- Officer H, former GED officer, stated (in summary): Gang officers glean more respect, are trusted more, and get access to more training opportunities than patrol officers.

Complaints and Discipline

Interviewees reported that gang members know that they can file complaints against GED officers whether there is validity in the complaint or not. It is known amongst the gang community that one or several complaints can deter or hinder an officer's career, specifically with promotional opportunities.

- Officer F, former GED sergeant, stated (in summary): Complaints are made against hard-working officers more so than on less productive officers, having a negative career impact on an officers' career.

Support from LAPD Leadership

A common sentiment from those interviewed was that Department leadership failed to provide sufficient support for GED units and that their work is constantly reviewed, sometimes by people that do not understand, or have experience in, the work of gang officers. Interviewees opined that this lack of understanding may hinder effective decision-making, support services, and the implementation of necessary policies. GED officers feel that the Department should provide more support to gang units.

- Officer F, former GED sergeant, stated: "*GED sergeants do not believe they receive support from the Department and command staff, nor do they understand the officer's reasons for performing their work in the manner necessary to gain intelligence*."
- Officer I, current GED sergeant, stated: "*A major concern is that individuals tasked with judging or assessing GED units may lack the experience or proper training. Many people in the administrative role of the gang units like Gang Impact Team (GIT) lieutenants, and*

bureau gang lieutenants, have never worked gangs. Therefore, they do not have the necessary experience and understanding to properly evaluate gang officers' job performance."

Personal Commitment When Assigned to GED

A common issue raised by interviewees is the demanding work schedule for GED officers, requiring significant scheduled and unscheduled overtime, affects an officer's personal life and family. Interviewees explained that the work is rigorous, as GED officers routinely contact dangerous gang members and/or criminals who treat the officers disrespectfully and interactions can often become life-threatening.

- Officer E, former GED lieutenant, stated (in summary): GED units are often inadequately staffed but assigned to the same mission and objectives, causing a disservice to the remaining officers, the unit, and the Bureau.
- Officer F, former, GED sergeant stated: "*I would not choose to do the assignment as a GED officer now, as it is too hard on families. You should confer with your wife or family members to ensure that it's not going to put a strain on your relationship. GED puts a lot of strain on your personal life*."
- Officer J, former GED officer, stated: "*Least rewarding, just the hours that it takes to do it. Yeah, it's, I think, if you were to look at the times that we, all of us, we're probably around the same age and point in our careers. Maybe five years on less than 10, newer families, little kids. I would say that the hours that you put into it. You're not home that often so. Between the working hours and the overtime and then you've got court the next day and suddenly you haven't been home for 48 hours*."

Understanding Department Policy

Based on interview responses, the Department pretext stop policy is confusing to GED officers and deters them from making pretext stops altogether. Additionally, interviewees reported that officers feel like "robots" when following the consent-to-search policy requirements.

- Officer H, former GED officer, stated (in summary): The pretext stop policy dissuades officers from making pretext stops. When the new policy was implemented, it was not thoroughly explained resulting in officers have different interpretations of how to implement the policy.

APPENDIX G

A note from the desk of...

LIZABETH RHODES, DIRECTOR
Office of Constitutional Policing and Policy

October 21, 2024

TO: **Office of the Inspector General**

SUBJECT: **Office of the Inspector General's GED analysis**

Mr. Buchner,

On September 20, 2024, the Office of the Inspector General provided the Department their findings from their review of 300 Gang Enforcement Detail stops sampled during the month of May 2023 and September 2023. The review covered an assessment of the Department's policies and practices related to the following:

1. Video activation
2. Pretext Stops
3. Automated Field Data Report (AFDR) Accuracy
4. Consensual searches
5. General stop conduct
6. Use of photographs

While the findings were presented, no specific recommendations or definitive conclusions were provided at this time. Based on the information shared, the Department is in a position to develop potential action plans and refine them once the direction of the review becomes clearer. Additionally, the Diversity, Equity, and Inclusion Division (DEID) will be submitting to the Inspector General (IG) specific instances where we believe clarification is required, as certain aspects of the findings may not have been fully or properly assessed.

Below is a summary of the findings as we understand them and the Department's proposed course of action moving forward.

Video Activation

The IG's review found that video activation rates were relatively low, with only 70% of body-worn video (BWV) and 23% of digital in-car video (DICV) being activated on time. However, the IG's review covered only a two-month period, which may have skewed the compliance rates due to the limited timeframe. Additionally, we observed that many BWV activations were marked as late; however, tactical considerations may not have been taken into account during the assessment of the footage. In most cases, the incidents are fully captured on BWV when the buffer period is factored in, and what may be considered a late

100 W. First Street, Suite 1050 Los Angeles, CA 90012
(213) 486-8730 Fax (213) 486-8727
www.LAPDOnline.org

activation often amounts to only a few seconds (e.g., the officer activates the BWV a few seconds after exiting the vehicle).

Further clarification is also requested regarding the findings related to DICV. Department policy does not require officers to document a late or non-activation if activating the DICV was not practicable. For those DICV-related findings, clarification is sought on what would be considered acceptable justification for a late or non-activated DICV.

Action Plan

The Office of Operations Bureau Inspection Teams regularly conducts video reviews assessing activation compliance under the Office of the Chief of Police (OCOP) Notice, Standardized Body Worn Video and Digital In-Car Video Inspection Procedures – Revised, dated July 9, 2024. As such, it is proposed that the Office of Operations will perform an **analysis of GED's yearly compliance rates and compare those with the IG's review. By** isolating the data specifically for GED units, the Department can develop a targeted plan of action based on this comparison.

Audit Division is (AD) currently drafting the 2025 Audit Plan and will add to the plan an inspection of GED stops with a focus on compliance with video activation policies.

Lastly, with the Department's transition to AXON as the provider for DICV, it is proposed that the Department explore additional AXON features to determine if DICV can be automatically activated when required.

Pretext Stops

Of the 60 pretext stops assessed by the IG, approximately 41 stops, or 68.3%, were properly articulated, either through BWV footage or documentation. As part of RIPA CompStat, AD also performs quarterly assessments of articulation for both pretext and non-pretext stops. **While AD's assessment does not specifically target GED stops, the IG's findings do reflect a** 33.3% improvement in compliance compared to the quarter 2, 2024 inspection conducted by AD.

Action Plan

However, the Department recognizes that articulation still requires improvement. As part of OCOP Notice, *Standardized Body Worn Video and Digital In-Car Video Inspection Procedures – Revised*, dated July 9, 2024, articulation in both pretext and non-pretext stops will now be assessed. Previously, video reviews did not include this evaluation. It is hoped that this expanded assessment will lead to improved officer articulation moving forward.

Additionally, the Department acknowledges that the current pretext policy may need simplification and is working to clarify it by adding specific sections outlining situations in which officers cannot make stops unless they are classified as pretext stops. Traffic units will be exempt from this requirement as their mission is to enforce all sections of the vehicle

traffic code. Once complete, a more detailed list of recommendations to modify the existing pretext stop policy will be presented to the incoming Chief of Police for consideration.

Lastly, the quarterly RIPA CompStat inspections continue to include discussions on both pretext and non-pretext stops to enhance Department personnel's understanding of these stops and help identify any stops that may have been incorrectly categorized.

AFDR Accuracy

The Department acknowledges that only about 21% of the reviewed stops by the IG had a correctly documented AFDR. Due to the numerous fields required for each stop, training, reviewing, and enforcing the proper and accurate completion of AFDRs has been challenging.

Action Plan

The Department has implemented the following in the effort to improve compliance with Assembly Bill (AB) 953:

1. Office of Operations Order No. 1, *Stops Review Pilot Program; Stops Review Package Completion Guide, Form 15.45.00 – Activated; Stops Review Package Automated Field Data Report Review, Form 15.46.00 – Activated*, dated July 9, 2024;
2. Office of Operations Notice, *Gang Enforcement Detail Stops Review Program – Established*, dated June 8, 2021.

Both stop reviews aim to provide a more collaborative assessment. Rather than simply providing the results of the review, supervisors are required to meet with the officers to discuss the specifics of the stop reviewed. The goal is to provide constructive dialogue focused on the accuracy of AFDR documentation, as well as procedural justice, and tactical considerations applicable during the stop.

The Department does however recognize the need to enhance the effectiveness of these reviews. As a supplement to the stop reviews, the RIPA unit also conducts quarterly BWV inspections and RIPA CompStat inspections during which AFDR accuracy and errors are discussed with each command. From these RIPA CompStat inspections, commands frequently request additional training, which the RIPA Unit provides upon request. To further support the Department, efforts will be made to expand this training so it can be offered more regularly.

Furthermore, the Office of Operations conducts quarterly inspections to ensure that AFDRs are completed as required. Modifications to the current inspection process are underway to enhance the identification of incidents that require an AFDR but are missing one.

Lastly, the IG's review noted that Department personnel do not appear to have a clear understanding of what constitutes a curbside detention, with officers incorrectly documenting curbside detentions on the AFDR approximately 35% of the time. Through the Department's

own internal inspections, along with RIPA CompStat inspections, we agree that Department personnel do not have a consistent grasp of the definition of a curbside detention. To address this, and to clarify the requirements for *all* data fields in the AFDR, the Office of the Chief of Police Administrative Order No. 6: *Automated Field Data Reports/Completion and Tracking – Revised*, dated October 9, 2024, was published.

Through these combined efforts, the Department is striving to ensure that AFDRs are completed accurately and consistently, enhancing both compliance with AB 953 and the integrity of the data collected.

Consensual Searches and General Stop Conduct

Based on the findings presented, there appears to be a pattern of officers primarily focusing on firearm recovery during stops, potentially overlooking other violations such as unlicensed drivers. In 52 out of 121 stops reviewed, or 43%, an unlicensed driver was allowed to drive away from the scene. The Department has also identified this trend during their quarterly consent to search inspections and recognizes that this practice increases the risk of traffic accidents, poses a danger to other drivers/pedestrians, as well as sends the wrong message about the importance of traffic regulations.

The IG's review also noted that in some instances, actions taken by detainees, such as agreeing to a search or allowing to be photographed, appeared to be coerced by officers. In these cases, it was observed that the individuals were handcuffed. The Department seeks clarification on whether the IG is interpreting the use of handcuffs as a factor that inhibits the detainee's ability to provide true, voluntary consent. Our understanding is that the use of handcuffs does not automatically invalidate a person's ability to give consent, but we recognize it can raise questions about whether the consent was voluntary. In general, courts look at the "totality of the circumstances" to determine whether consent was freely and voluntarily given. The Department seeks clarification on those incidents/stops in which the IG felt coercion took place.

Action Plan

The Department is committed to ensuring that traffic laws are enforced consistently, and that public safety is prioritized in every interaction. A pilot program was developed to provide individualized instruction to officers using their own body-worn video (BWV) footage. The goal of this training is to reinforce officers' and supervisors' understanding of constitutional policing and improve interactions with the public. Details of the pilot program can be found in the Office of the Chief of Police Notice, *Individualized Body Worn Video Training – Pilot Program*, dated August 9, 2024.

Additionally, the Department plans to continue holding quarterly RIPA CompStat inspections, which include reviews of consent searches. As part of these inspections, each commanding officer is required to review BWV footage from at least four stops that involve a consensual search. Any concerns identified during these stops will be addressed during the RIPA CompStat inspection, where commanding officers must explain the actions they are

taking to resolve the specific issues identified. This ongoing process is designed to ensure accountability and continuous improvement.

Use of Photographs

Regarding the photographing of individuals by our gang units, the Department has also observed inconsistencies. Some units take photographs while others do not. Storage methods also vary, with some units maintaining photos in gang books, while others utilize AXON's cloud-based platform, Evidence.com, for storage.

Action Plan

To address the lack of consistency and confusion, the Office of Constitutional Policing and Policy has opened project number 24-035 "Gang Member Documentation" to draft a Special Order revising specific Department Manual sections that govern the documentation of criminal street gangs, their members and associates, and reflects the provisions of the Cal/Gang System Moratorium integrated into the Department Manual.

Department's Review of Findings

The IG provided a spreadsheet of their findings and attached is the Department's review of those findings. For ease of review, only incidents/stops with specific comments have been included.

If you have any questions related to the above, please let me know.

Respectfully,

Liz

Attachments

100 W. First Street, Suite 1050 Los Angeles, CA 90012
(213) 486-8730 Fax (213) 486-8727
www.LAPDOnline.org