

INTRADEPARTMENTAL CORRESPONDENCE

November 5, 2014
14.2

TO: The Honorable Board of Police Commissioners

FROM: Chief of Police

SUBJECT: OPERATIONS – CENTRAL BUREAU VICE COMMAND
ACCOUNTABILITY PERFORMANCE AUDIT (IAID NO. 14-053)

RECOMMENDED ACTIONS

1. The Board of Police Commissioners REVIEW and APPROVE the attached Operations – Central Bureau (OCB) Vice Command Accountability Performance Audit (CAPA).
2. The Board of Police Commissioners REVIEW and APPROVE the attached Executive Summary thereto.

DISCUSSION

Internal Audits and Inspections Division conducted the OCB Vice CAPA to evaluate adherence with related Department directives.

If additional information regarding this audit is required, please contact Arif Alikhan, Special Assistant for Constitutional Policing, at (213) 486-8730.

Respectfully,



CHARLIE BECK
Chief of Police

Attachment

LOS ANGELES POLICE DEPARTMENT

*OPERATIONS-CENTRAL BUREAU
VICE COMMAND ACCOUNTABILITY
PERFORMANCE AUDIT*

(IAID No. 14-053)



Conducted by
INTERNAL AUDITS AND INSPECTIONS DIVISION

CHARLIE BECK
Chief of Police

October 2014

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EXECUTIVE SUMMARY
OPERATIONS-CENTRAL BUREAU VICE
COMMAND ACCOUNTABILITY PERFORMANCE AUDIT
Conducted by
Internal Audits and Inspections Division
Fourth Quarter, Fiscal Year 2013/14

PURPOSE

In accordance with the Los Angeles Police Department (Department) Annual Audit and Inspection Plan for fiscal year 2013/14, Internal Audits and Inspections Division (IAID) conducted the Operations–Central Bureau (OCB) Vice Command Accountability Performance Audit (CAPA). The Vice CAPAs are performed to determine if the internal controls within each geographic Area are effective to ensure they are operating within Department policies and procedures, as well as other established criteria set forth by State and federal guidelines.

BACKGROUND

This is the second Vice CAPA performed for OCB. The prior audit was completed in December 2012. Overall the results of this audit are comparable to the prior audit with the exception of Objective No. 4 – Completion of Standards Based Assessments. The Department achieved 84 percent compliance in this audit, which is a significant improvement in comparison to the 60 percent compliance achieved in the prior audit.

The audit included an evaluation of OCB Vice units' operating procedures and work product which included: Arrest Reports, Form 05.02.00, Search/Ramey Warrants, Standards Based Assessments (SBAs), Form 01.87.00, Sergeant Daily Reports (SDRs), Form 15.48.00, Daily Activities Logs (DALs) and Expenditure of Secret Service Funds, Forms, 15.37.01. The aforementioned documents were examined for accuracy, completeness, timely submission, articulation of reasonable suspicion/probable cause and supervisory oversight.

SUMMARY OF FINDINGS

The audit consisted of ten objectives. The Department had 100 percent compliance in seven of the ten objectives; Evaluation of Arrest Reports (three objectives), specific to articulation of reasonable suspicion/probable cause, articulation of search and seizure, and admonition of Miranda Rights.¹ It should be noted that the aforementioned six objectives were considered high risk and included articulation of reasonable suspicion and probable cause, articulation of search and seizure, admonition of Miranda, Evaluation of Vice Investigations (three objectives) specific to adherence to disrobing requirements, supervisory review of vice officers' DALs, accurate recording of daily activities in DALs and accuracy and completeness of Expenditure of Secret Service Funds forms.

An 80 percent or higher compliance was achieved in the three remaining objectives. The three objectives were administrative in nature and encompassed the following areas:

¹There were no search warrants served during the audit period; therefore, Objective No. 2 was not applicable.

- Consistency of information among the Arrest Report Packages²;
- Timely and accurate completion of vice officers' SBAs and,
- Evaluation of Supervisory Roles.

ACTIONS TAKEN/MANAGEMENT'S RESPONSE

Internal Audits and Inspections Division presented the CAPA report and findings to the Assistant to the Director, Office of Operations and the C/O, OCB, both were in general agreement with the findings.

²For the purposes of this report "Arrest Report Packages" included the Arrest Report, arrest narrative, Property Report, Receipt for Property Taken into Custody, Booking Approval and Probable Cause Determination.

**OPERATIONS - CENTRAL BUREAU VICE
COMMAND ACCOUNTABILITY PERFORMANCE AUDIT**

**Conducted by
Internal Audits and Inspections Division
Fourth Quarter, Fiscal Year 2013/14**

PURPOSE

In accordance with the Los Angeles Police Department (Department) Annual Audit and Inspection Plan, for fiscal year 2013/14, Internal Audits and Inspections Division (IAID) conducted the Operations – Central Bureau (OCB) Vice Command Accountability Performance Audit (CAPA). The Vice CAPAs are performed to determine if the internal controls within each geographic Area are effective to ensure they are operating within Department policies and procedures, as well as other established criteria set forth by State and federal guidelines.

Internal Audits and Inspections Division conducted this performance audit under the guidance of generally accepted government auditing standards, specifically pertaining to performing the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on the audit objectives. Internal Audits and Inspections Division has determined that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

BACKGROUND

Internal Audits and Inspections Division developed CAPAs to address risk management issues, assess operations, and provide timely information to Department management pertaining to vice units.

PRIOR AUDITS

This is the second Vice CAPA performed for OCB. Internal Audits and Inspections Division previously completed an OCB Vice CAPA in December of 2012.

METHODOLOGY

Scope

The audit included an evaluation of OSB Vice Units' operating procedures and work product, which included: Arrest Reports, Form 05.02.00, Search/Ramey Warrants, Standards Based Assessments (SBAs), Form 01.87.00, Sergeant Daily Reports (SDRs), Form 15.48.00, Daily Activities Logs (DALs), Daily Field Activity Reports (DFARs), Form 15.52.00 and Expenditure of Secret Service Funds, Form 15.37.01. The aforementioned documents were examined for accuracy, completeness, timely submission, articulation of reasonable suspicion/probable cause and supervisory oversight.

The period reviewed was from January 1, 2014, to February 28, 2014. The audit steps employed are further delineated under each audit objective.

Fieldwork

The fieldwork was performed between April 1, 2014, and May 27, 2014.

Internal Audits and Inspections Division met with the Commanding Officer (C/O) of OCB and provided an Intradepartmental Correspondence, Form 15.02.00, explaining the audit's methodology and requested input regarding additional areas requiring evaluation.

SUMMARY OF FINDINGS

Table No. 1-Summary of Audit Findings

Objective No.	Description of Audit Objective	2012/13 Operations-Central Bureau Totals	2013/14 Operations-Central Bureau Totals
1. Evaluation of Arrest Reports			
1(a)	Articulation of Reasonable Suspicion and Probable Cause to Arrest	55/55 (100%)	47/47 (100%)
1(b)	Articulation of Search and Seizure	55/55 (100%)	47/47 (100%)
1(c)	Admonition of Miranda Rights	55/55 (100%)	47/47 (100%)
2. Evaluation of Search/Ramey Warrant Packages			
2	Evaluation of Search/Ramey Warrant Packages ¹	N/A	N/A
3. Consistency of Information			
3	Evaluation of Arrest Report Packages ²	50/55 (91%)	41/47 (87%)
4. Completion of Standards Based Assessments			
4	Completion of Standards Based Assessments	24/40 (60%)	26/31 (84%)
5. Evaluation of Vice Investigations³			
5(a)	Adherence to Disrobing Requirements	4/4 (100%)	8/8 (100%)
5(b)	Evaluation of Vice Officer Roles	N/A	26/26 (100%)
5(c)(1)	Evaluation of Supervisory Roles	N/A	22/26 (85%)
5(c)(2)	Evaluation of Supervisory Roles	N/A	26/26 (100%)
5(d)	Expenditure of Secret Service Funds	N/A	10/10 (100%)

¹There were no search warrants served during the audit period which involved a vice officer as the affiant.

²For the purpose of this report "Arrest Report Package" includes the Arrest Report and associated documents.

³Objective Nos. 5(b), 5(c)1, 5(c)2, and 5(d) were not included in the 2012/13 Audit.

DETAILED FINDINGS

Objective No. 1 – Evaluation of Arrest Reports

This objective and sub-objectives included the review of Arrest Reports completed by all personnel assigned to OCB Vice during the audit period. The arrest reports were evaluated to determine whether they included articulation of legal sufficiency for actions taken, and whether they contained evidence of significant deviations from Department policies and procedures.

Internal Audits and Inspections Division identified a total of 47 arrest reports. A copy of each report was obtained directly from the respective Area's Records Unit.

Objective No. 1(a) – Articulation of Reasonable Suspicion and Probable Cause to Arrest

Criteria

Department Manual Section 1/508, Police Action Based on Legal Justification, states, *"What is reasonable in terms of appropriate police action or what constitutes probable cause varies with each situation, and different facts may justify either an investigation, a detention, a search, an arrest, or no action at all. The requirement that legal justification be present imposes a limitation on an officer's action. In every case, officers must act reasonably within the limits of their authority as defined by statute and judicial interpretation, thereby ensuring that the rights of both the individual and the public are protected."*

Audit Procedures

Each arrest report was reviewed to determine whether it sufficiently articulated the legal basis for all actions taken (e.g., detentions, arrests, and searches). Arrest reports that articulated the aforementioned criteria and procedures met the standards for this objective.

Findings

Each (100%) of the 47 arrest reports met the standards for this objective.

Objective No. 1(b) – Articulation of Search and Seizure

Criteria

Department Manual section 4/217, Searches of Suspects and Arrestees, states, *"When the rules of search and seizure permit, an arrestee shall be thoroughly searched as soon as practicable."*

The Fourth Amendment of the United States Constitution protects people against unreasonable searches. As such, Department personnel are required to document the legal basis for conducting searches which includes the following: search warrants, probable cause, incident to arrest, consent, or exigent circumstances.

Audit Procedures

Each arrest report was reviewed to evaluate the legality of the search, including booking searches involving strip and visual body cavity searches. Arrest reports that articulated the search authority met the standards for this objective.

Findings

Each (100%) of the 47 arrest reports met the standards for this objective.⁴

Objective No. 1(c) – Admonition of Miranda Rights

Criteria

Department Manual, section 4/202.10, Interrogation of Suspects – Admonition of Miranda Rights, states, *“Interrogating Officers-Responsibilities. When officers are conducting a custodial interrogation, the following procedures shall be followed:*

- *Officers shall read the Miranda admonition verbatim as delineated in the Officer’s Notebook, Form 15.03.00;”*
- *Officers shall document the suspect’s responses to the Miranda admonition in the appropriate report.”*

Audit Procedures

Each arrest report was reviewed for the overall chronology of arrest events, specifically examining whether a detainee was interrogated regarding his/her participation in criminal activity. Arrest reports were also reviewed for evidence of Miranda Rights adherence. Arrest reports that contained no evidence of Miranda Rights Admonition violations met the standards for this objective.

Findings

Each (100%) of the 47 arrest reports met the standards for this objective.

Objective No. 2 – Evaluation of Search/Ramey Warrant Packages

Criteria

Department Manual, section 4/742.10, Search Warrant and Probable Cause Arrest Warrant Procedures, states, *“All Department personnel involved in the service (including the planning and debriefing) of a search or Ramey warrant shall comply with the instructions set forth in the*

⁴Searches incident to arrest were not considered for this objective.

Search Warrant Service Procedures Guide, prepared by Investigative Analysis Section, Detective Bureau. Each commanding officer shall be responsible for maintaining the Search Warrant Service Procedures Guide and ensuring that such procedures are made available to Department personnel. Department personnel shall follow these guidelines when preparing, obtaining, serving, and returning a search warrant."

Audit Procedures

A review of OCB Area Warrant Tracking Logs during the audit period revealed there were no search warrants served, which involved a vice officer as the affiant.

Objective No. 3 – Consistency of Information

Criteria

Department Manual, section 4/216.01, Advice/Approval on Felony Bookings, states, "*Arrest Reports. Consistent with current procedure, the watch commander or a supervisor designated by the watch commander shall review all reports related to the arrest for appropriateness, legality, and conformance with Department policy and procedure taking into account booking recommendation. Additionally, the watch commander or supervisor shall examine the reports for authenticity by ensuring that the reports do not contain any 'canned' language, inconsistent information, or fail to articulate the legal basis for the action, or any indication that the information in the report(s) is not authentic or correct.*"

Audit Procedures

Each Arrest Report Package was assessed for inconsistent information contained in the Arrest Report, and associated documents. Inconsistent information was defined as inconsistencies that would have an impact on the investigation or question the associated documents. Documents reviewed included the Arrest Report, Property Report, Form 10.01.00, Receipt for Property Taken into Custody, Form 10.10.00, Booking Approval, Form 12.31.00, and Probable Cause Determination. Arrest Report Packages that did not contain significant inconsistent information within each report and associated documents met the standards for this objective.

Findings

Forty-one (87%) of the 47 Arrest Report Packages reviewed met the standards for this objective. The Arrest Report Packages that did not meet the standards are detailed below:

Rampart Area

- Booking Nos. 3862305, 3862320, DR Nos. 140204562, 140204558, 140205532 and 140205594 – The Arrest Report narrative indicates Prostitute Enforcement Detail (PED) officers were in raid jackets. However, the Vice supervisor's log indicated PED officers were in full uniform.

Objective No. 4 – Completion of Standards Based Assessments

Criteria

Department Manual section 3/760.20, Standards Based Assessment - Lieutenants and Below states, *"Supervisors who receive a Performance Evaluation Report Action Item (PERAI) shall:*

- *Review the concerned employee's Training Evaluation and Management System (TEAMS) report and all other available documents...;*"
- *"Complete the SBA and,*
- *Serve the employee with the final paper copy of the SBA, and complete the PERAI no later than 90-calendar days after the date it was issued."*⁵

According to the SBA Guidelines for Completing the Report, a Risk Management Information System (RMIS) Action Item number, which corresponds with the TEAMS II Action Item number, is required in the Administrative Section of the report. The report must also contain signatures and dates of the employee, Department/unit assessor, reviewing supervisor, and C/O.⁶

Audit Procedures

Internal Audits and Inspections Division reviewed the Watch Assignment and Timekeeping Sheet for OCB Vice personnel employed during the audit period and determined there were a total of 31 Vice personnel. The 31 Division Employee Folders were reviewed to determine if a current SBA was completed and present for each employee's most recent rank anniversary date, and if it contained the appropriate signatures. Additionally, each employee's TEAMS II report was reviewed to determine if the PERAI was closed within 90 calendar days of the date issued.

Findings

Of the 31 personnel assigned to Vice during the audit period, there were seven sergeants and 24 officers. Internal Audits and Inspections Division reviewed the Division Employee Folders packages to determine if the following Department policy and procedures were followed:

- The SBA was completed for the current rating period;
- The SBA was signed by the employee, supervisors, and the C/O; and,
- The PERAI was closed within 90 calendar days of the date issued.

Twenty-six (84%) of the 31 SBAs met the standards. The remaining five SBAs did not meet the standards for the following reasons:

⁵ A Standards Based Assessment is designed to reflect factual employee performance of behavior.

⁶ See Department, Form 01.87.02, (09/11).

Central Area

- One SBA was signed by the C/O after 90 days.

Rampart Area

- One SBA was not current and did not contain the RMIS Action Item number.
- One SBA was signed by the C/O after 90 days.

Hollenbeck Area

- One SBA was signed by the C/O after 90 days.

Newton Area

- One SBA was signed by the C/O after 90 days.

Objective No. 5 – Evaluation of Vice Investigations

This objective and sub-objective included the evaluation of vice units and their adherence to the Vice Procedures Manual, volume 1, section 020, Area Vice Units.

Objective No. 5(a) – Adherence to Disrobing Requirements

Criteria

Vice Procedures Manual, volume 1, section 040, Disrobing for Vice Investigations, states:

“The increased prostitution activity encountered at massage parlors and other sexually oriented business fronts, which operate as houses of prostitution, has presented vice officers with additional enforcement burdens. The locations have become highly sophisticated in their individual operations, making it difficult for officers to obtain prostitution violations and related offenses without disrobing.

NOTE: *For purposes of this manual, to disrobe means to remove one’s clothing exposing the upper and/or lower torso.*

*Area vice enforcement officers may disrobe during a vice investigation of **major concern** only after exhausting all other investigative techniques, and after obtaining prior approval. Blanket approval for disrobing shall not be permitted; therefore, each investigation requires prior written approval by the concerned bureau commanding officer...*

- B. *“Requests for disrobing shall be submitted to the concerned bureau commanding officer and shall include all pertinent information to substantiate the disrobing request...”*

- D. *“Written after-action reports shall recapitulate all resulting enforcement activity and shall be forwarded to the concerned bureau commanding officer as soon as possible after the conclusion of the investigation.”*

Audit Procedures

Internal Audits and Inspections Division reviewed each arrest report to determine if there was any physical contact between the officer and the suspect. Physical contact should be avoided, however, in cases where physical contact is attempted or completed; officers shall immediately cease the activity.

If auditors learned that disrobing took place during the physical contact, they contacted the concerned bureau C/O to ensure a disrobing request had been approved and that the vice unit completed an After-Action Report and forwarded it to the concerned bureau C/O. Arrest reports that contained evidence of prior written approval, as well as an After-Action Report, met the standards for this objective.

Findings

A review of arrest reports during the audit period revealed there were eight incidents where an officer disrobed. The officers had prior bureau approval and an After-Action Report was completed for all eight incidents (100%).

Objective No. 5(b) – Evaluation of Vice Officer Roles

Criteria

Vice Procedures Manual, volume 1, section 100, Vice Officers' Daily Logbook Requirements, states, *“While the undercover vice officers are not required to maintain a Daily Field Activity Report (DFAR), they shall record their daily activities in a Department approved logbook. This shall include, at a minimum, the following information:*

- *Date and Time (Start of Watch and End of Watch for each officer);*
- *Officers' name and unit number;*
- *Vehicle used for the day (Shop Number or Make, Model, and color for rentals);*
- *Field Investigations;*
- *All Arrests, including the location, name of the individual, charge and booking, RFC or citation number;*
- *3.18 investigations conducted during the day, both administrative/field; and,*
- *Secret Service expenditures, including vehicle rentals.”*

Audit Procedures

On the dates an arrest was made by either a vice or PED officer, IAID collected the corresponding Daily Activity Logs (DALs) or Daily Field Activity Reports (DFAR) for PED officers. The applicable documents were reviewed to determine if the required information was complete and accurate.⁷

Note: The CO of Detective Support and Vice Division (DSVD) was advised that several Area Vice Units were not using Department Approved Logbooks. The CO advised that DSVD is in the process of revising the Vice Manual to give officers the option of recording the mandated information in either a logbook or a computer generated DAL. The C/O further advised that the aforementioned manual revision was a priority and would be completed forthwith.

Findings

Each (100%) of the 26 DALs reviewed met the standards for this objective.

Objective No. 5(c)(1) – Evaluation of Supervisory Roles (SDRs)

Criteria

The Sergeant's Daily Report (SDR) is used to capture oversight activities completed by a field supervisor on a daily basis.

Special Order No. 33, June 30, 2009, Sergeant's Daily Report (SDR) Field Notebook Divider, Form 18.49.00 – Activated, states, "*Purpose. The SDR is intended to give Area watch commanders and commanding officers a tool to better evaluate the performance of field supervisors.*"

Audit Procedures

On the dates when arrests were made by the Vice Unit, IAID collected the corresponding SDRs. A total of 26 SDRs, at a minimum, were required to be completed. Internal Audits and Inspections Division reviewed the SDRs to determine if one was submitted to the watch commander (W/C) by the vice supervisor who had oversight of the Vice Unit on the arrest date.

Findings

Twenty-two (85%) of the 26 SDRs reviewed met the standards for this objective. The SDRs that did not meet the standards are detailed on the following page:

⁷No DFARs were completed by PED officers during the audit period.

Central Area

- Although there were two vice supervisors working, only one SDR was completed for the following dates: 1/19/14, 2/7/14, 2/14/14, and 2/19/14.

Objective No. 5(c)(2) – Evaluation of Supervisory Roles (DALs)

Criteria

Vice Procedures Manual, volume 1, section 100, Vice Officers' Daily Logbook Requirements, states – *"The vice supervisors shall review the logbooks on a regular basis for accuracy and completeness and initial each page within."*

Vice Procedures Manual, volume 1, section 070, Vice Officers' Prostitution Enforcement Detail, states - *"During normal operations, Prostitution Enforcement Detail (PED) officers shall be in full uniform. Deviation from uniformed assignment should be the exception and shall be approved by the Area commanding officer. This approval for PED officers to work in plain clothes shall not exceed five days within any deployment period. The Area C/Os approval, whether verbal or written, must be documented in the Sergeant's Daily Report, Form 15.48.00. Additionally, the Area vice sergeant shall be responsible for recording the PED officers' uniform or plain clothes status in their SDR."*

Audit Procedures

Auditors also reviewed each DAL associated with the date of each arrest to determine if the vice supervisor initialed each page.⁸ The DALs that were initialed by a vice supervisor met the standards for this objective.

Findings

Each (100%) of the 26 arrest packages met the standards for this objective.

Objective No. 5(d) – Expenditure of Secret Service Funds

Criteria

Vice Procedures Manual, volume 1, section 075, Secret Service Funds (Chit), states, *"The control and auditing of Secret Service Fund expenditures is accomplished through the use of the Monthly Report of Secret Service Money Form (15.37.01), and Expenditure of Secret Service Funds Form (15.37.01).*

An officer shall complete an expenditure chit, Form 15.37.01 (original and one copy)

⁸See Office of the Chief of Police Notice, March 1, 2012, Vice Officers' Daily Logbook Requirements.

for all expenditures occurring during an investigation. The form is to be completed in black ink or computer generated."

Audit Procedures

On the dates when an Expenditure of Secret Service Funds form was used, as documented in the vice officer's DAL, IAID reviewed the form for accuracy and completeness. A total of ten Expenditure of Secret Service Funds forms were applicable for review. The forms that were accurate and complete met the standards for this objective.

Findings

Each (100%) of the ten Expenditure of Secret Service Funds forms reviewed met the standards for this objective.

OTHER RELATED MATTERS

In the course of this audit, it was found that while all OCB Areas were completing SDRs, the incorrect form and the name of the W/C and at SOW and EOW was not being documented as required by Operations Order No. 1, January 10, 2012, Check-In Procedures for Area Specialized Units. Operations-Central Bureau was advised of this issue and has already implemented training to ensure vice units use the correct form and document all the appropriate information.

ACTIONS TAKEN/MANAGEMENT'S RESPONSE

Internal Audits and Inspections Division presented the CAPA report and findings to the Assistant to the Director, Office of Operations and the C/O, OCB, both were in general agreement with the findings.

INTRADEPARTMENTAL CORRESPONDENCE

September 24, 2014

1.4

TO: Commanding Officer, Internal Audits and Inspections Division

FROM: Commanding Officer, Operations-Central Bureau

SUBJECT: OPERATIONS-CENTRAL BUREAU'S VICE COMMAND
ACCOUNTABILITY PERFORMANCE AUDIT, SECOND
QUARTER, FISCAL YEAR 2013/2014 – REVISED

Internal Audits and Inspection Division (IAID) conducted the Operations-Central Bureau (OCB) Vice Command Accountability Performance Audit (CAPA) for the Second Quarter, Fiscal Year 2013/2014. This was the second Vice CAPA performed for OCB. The findings showed that OCB was in 100% compliance in seven of the eleven sections audited that were contained within five of the objectives. Discrepancies were noted for three objectives: Consistency of Information (87%), Completion of Standard Based Assessments (84%), and Evaluation of Supervisory Roles (85%). OCB has reviewed the findings and responded to the discrepancies identified for these three objectives involving the following OCB commands: Central, Hollenbeck, Newton, Northeast and Rampart Areas. The following summarizes the responses by the OCB commands:

Rampart Area

Objective No. 3 – Consistency of Information - One minor discrepancy was noted. The findings and actions taken are noted below:

Rampart Area - Booking Nos. 3862305, 3862320; DR Nos. 140204562, 140204558, 140205532 and 140205594 – *The Arrest Report narrative indicates Prostitute Enforcement Detail (PED) officers were in raid jackets. However, the Vice Supervisor's Log indicated PED officers were in full uniform.*

The Rampart Vice Officer-in-Charge (OIC) stated that it had been a longstanding practice, with the approval of the Rampart Area Commanding Officer(s), to consider the PED officers as meeting the uniform requirement when they were wearing raid jackets, ballistic vests and full gun belts, while driving a marked black and white police vehicle. The PED officers were clearly identifiable as police officers, were not operating in an undercover capacity and were strictly involved in the enforcement aspect of the operations. With that said, this practice was discontinued in DP 5, 2014, and the PED officers are now in compliance with the uniform requirement (Vice Enforcement Manual, Volume 1, Page 15). The Rampart Vice OIC and Area Commanding Officer (C/O) will ensure compliance through periodic inspections. The Rampart Vice OIC has provided training to his officers. The OCB Vice Coordinator provided the Rampart Vice OIC and officers feedback and training at the DSVD/OCB Vice Inspection on June 24, 2014.

Objective No. 4 – Completion of Standards Based Assessment (SBA) - Five minor discrepancies were noted. The findings and actions taken are noted below:

Note: The OCB Vice Coordinator provided SBA training to the SBA/Teams II Coordinators at each command during 2013. This resulted in a significant improvement since the last OCB Vice CAPA, Second Quarter, Fiscal Year 2012/2013. The OCB Vice Coordinator also provided additional training to the OCB Commanding Officers at the OCB Command Officers' Meeting on April 16, 2014, and at the OCB Vice Supervisors' Meeting on June 18, 2014. This issue will also be addressed at the OCB Vice Supervisors' Meeting on October 2, 2014.

Central Area - One SBA was signed by the C/O after 90 days.

This SBA Action Item was created on February 2, 2014, and the supervisor submitted the SBA on April 4, 2014. However, the final signatures were not obtained until May 13, 2014, past the 90-day requirement. The Action Item was also closed out beyond the 90-day requirement. The Central Area Teams II Coordinator created a tracking system to ensure future compliance. The Central Area Vice supervisors will also track the status of each pending SBA. The Central Area supervisors were provided training on the SBA guidelines. The Central Area C/O and Vice Unit supervisors will continue to ensure proper oversight and compliance.

Rampart Area - One SBA was not current and did not contain the RMIS Action Item number, and one SBA was signed by the C/O after 90 days.

The first SBA was not current and did not contain an Action Item number. This SBA was for an employee who transferred to Rampart Area in September 2013. The SBA was completed by his prior command, Use of Force Review Division. The C/O, Use of Force Review Division, was notified of the necessity to complete SBAs to make the employee current, as well as the omission of the Action Item number on the SBA.

The second SBA, which was signed by the C/O after the 90-day requirement, was completed and submitted to the Area Office in a timely manner and on schedule. Unfortunately, the SBA was misplaced and consequently was not forwarded to the C/O for signature until after the 90-day requirement. The responsibility of assigning, tracking and following up on SBAs has been transferred to a new staff member in the Rampart Area Office, who has implemented a tracking system which will prevent future delays in obtaining C/O's signatures.

Hollenbeck Area - One SBA was signed by the C/O after 90 days.

The Hollenbeck Vice OIC submitted the SBA on time, but it was not signed by the Area C/O within the 90-day requirement. To ensure compliance, the Hollenbeck Teams II Coordinator will meet with the assigned supervisor, ten days after an SBA has been assigned, and provide the submission date of the SBA. The submission date will be ten days prior to the mandatory 90-day deadline. Thirty days after the first meeting, the Teams II Coordinator will conduct a follow-up with the assigned supervisor and determine the status of the SBA. The Teams II Coordinator

will then monitor the progress, on a weekly basis, to ensure the SBA submission deadline is met. The Teams II Coordinator will document the meetings.

The OCB Vice Coordinator provided feedback and training to the Hollenbeck Vice OIC on July 28 and 30, 2014. Feedback on the Hollenbeck SBA tracking system was also provided to the Hollenbeck Patrol C/O (Acting Area C/O) on July 28 and 29, 2014.

Newton Area - One SBA was signed by the C/O after 90 days.

The review of the SBAs for Newton Area Vice noted one discrepancy. The SBA Action Item was created on April 11, 2013, but the SBA was not signed by the C/O until August 9, 2013, past the 90-day requirement. This SBA was initially completed on time, but was misplaced. Subsequently, another SBA needed to be reproduced creating the late signatures. Due to the discovery of the late SBA, the Newton Area TEAMS II Coordinator now tracks the SBAs daily in the C/O's TEAMS work list. The Teams II Coordinator submits a SBA Checklist with each SBA to be reviewed by the C/O to ensure compliance. The Teams II Coordinator collaborates with the Area Office to track when an SBA is submitted to the C/O for review, signature, and to be served on personnel. The Newton Area C/O's Office maintains a matrix to track SBAs and oversee the process. Newton Area expects to avoid future discrepancies with this process in place.

Objective No. 5(c)(1) – Evaluation of Supervisory Roles (SDRs) - One minor discrepancy was noted. The findings and actions taken are noted below:

Central Area - Although there were two supervisors, only one SDR was completed for the following dates: 1/19/14, 2/7/14, 2/14/14 and 2/19/14.

The Central Area Vice supervisors were in compliance with Special Order No. 33, Sergeant's Daily Report (SDR) Field Notebook Divider, dated June 30, 2009, using the current SDR in LAPD Forms. They were also in compliance with Operations Order No. 1, Check-In Procedures for Specialized Units, dated January 10, 2012. However, two supervisors used only one SDR on four dates. The OCB Vice Coordinator addressed this issue with one Central Area Vice supervisor during the DSVD/OCB Central Vice Inspection on February 13, 2014. This issue was also addressed with the OCB Vice supervisors on February 27, 2014, and during other communications. This issue will also be addressed at the OCB Vice Supervisors' Meeting on October 2, 2014. The Central Vice supervisors have received feedback and training and are now completing separate SDRs. The Central Vice supervisors have reviewed the SDR Field Notebook Divider.

In summary, the discrepancies identified within the OCB commands were investigated, with corrective measures taken. The results of this audit were discussed with the Vice supervisors to ensure future compliance with Department policies. The OCB commands have taken proactive steps to ensure that there is proper supervisory oversight, and that there are properly functioning systems in place to ensure compliance with the objectives in this audit.

Commanding Officer, Internal Audits and Inspections Division

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If you have any questions regarding this matter, please contact Lieutenant II Cindy Benes, OCB Vice Coordinator, at (213) 833-3775.

A handwritten signature in black ink, appearing to read "Jose Perez, Jr." with a stylized flourish at the end.

JOSE PEREZ, Jr., Deputy Chief
Commanding Officer
Operations-Central Bureau