



LOS ANGELES POLICE DEPARTMENT

TACTICAL CONCEPTS

Tactics Training Overview

Tactical Concept No. 14

April 2025

VEHICLE PULLOVERS – STOLEN VEHICLES

PURPOSE

The purpose of this Tactical Concept is to provide officers with guidance regarding vehicle pullovers when the vehicle being stopped is reasonably believed to be a stolen vehicle.

BACKGROUND

The Ninth Circuit Court of Appeals has held that officers must have articulable facts, based on the objectively reasonable standard, to support the use of high-risk stop tactics when stopping a suspected stolen vehicle. This means that officers may not conduct a high-risk stop based solely on reasonable suspicion that a vehicle is stolen. The generic dangers posed by stopping a suspected stolen or cold-plated vehicle, alone, are insufficient to justify the use of high-risk tactics. Additional articulation is necessary to escalate from an investigative stop to a high-risk stop when dealing with suspected stolen vehicles. Officers are reminded to approach all vehicle pullovers with caution and that no vehicle stop is “routine.”

Note: The information contained in this Tactical Concept does not apply to vehicles reasonably believed to have been involved in a separate violent and/or dangerous felony or serious misdemeanor crime, such as brandishing a weapon, robbery, or burglary. A vehicle returning as Code Six Charles (C6C) is, on its own, enough articulation to elevate the encounter to high-risk.

High-Risk Stops, Review

Per the Department manual:

The Department has authorized the use of the high-risk prone search to ensure the safety of both officers and suspects. The high-risk prone search shall only be used when the officer has a reasonable suspicion of a risk for serious injury to the officer and/or the public.

Note: A "reasonable suspicion" can include an officer's observations of the suspect's activity, the suspect's demeanor during the stop or any other factor that clearly indicates the risk for serious injury. Any or all of these

could give an officer a reasonable suspicion that a suspect might be armed ...

The goal of any tactic, including search techniques, is to maintain control of the suspect while reducing the potential for violence. The use of the high-risk prone search tactic must be based on the totality of the circumstances that reasonably pose a threat to officers or bystanders ...

Although officers may be authorized to use high-risk stop and/or search tactics, they are not required to do so, particularly if they believe less intrusive tactics can be used to safely detain the persons involved; or, if they believe there are other circumstances which suggest that the tactic may not be appropriate (e.g., apparent physical disability which would make it difficult for the person to get into a prone position).

If officers have no specific justifications for a high-risk stop, such as those described below, and decide to pull over a suspected stolen vehicle, they can then conduct an investigative stop and direct the occupants out of the vehicle without using high-risk tactics, see *Alternatives to High-Risk Stops*, below.

PROCEDURE

Alternatives to High-Risk Stops

In situations where officers have no articulable basis for a high-risk stop when interacting with a suspected stolen vehicle, they can conduct what has been termed a *tactical investigative stop* by the Ninth Circuit Court of Appeals. In this type of stop, a subset of investigative stops, officers direct the occupants out of the vehicle without using full high-risk stop tactics. Investigative stops are typically conducted when an officer has reasonable suspicion that one or more occupants of the vehicle are involved in criminal activity, which includes driving or riding in a vehicle believed to be stolen (or cold-plated).

Note: These types of stops/tactical approaches are general guidelines only. Officers shall familiarize themselves with Department tactical concepts and routinely discuss tactical scenario responses with their partners. Tactical discussions should include basic tactical concepts such as contact, cover, communication, tactical de-escalation, as well as each officer's responsibilities during tactical encounters with the public. Officers should understand that their responsibilities may shift during dynamic situations and officers should be flexible and adapt as needed.

When initiating these tactical investigative stops, vehicle positioning is the same as that of a high-risk stop. The primary vehicle will come to a stop approximately two car lengths directly behind the target vehicle, ensuring that both the driver and passenger officers maintain a clear line of sight. Meanwhile, the secondary officers' vehicle will be positioned at an approximate 45-degree angle next to the primary vehicle. Both the

primary officers and the secondary officers should be out of their vehicles with the police doors open utilizing the ballistic doors as cover.

Based on the facts known to the officers at the time of the stop, officers may decide to draw and exhibit their firearms during the tactical investigative stop. When doing so, officers must adhere to the Department's policy on drawing and exhibiting firearms. If firearms are drawn, they shall be held in the low ready position. Officers are to be reminded that the muzzle is maintained in a manner that does not physically cover the occupants, unless doing so can be justified.

Officers will direct the occupants to exit the vehicle, individually, and relocate them to a secure area/location where the officers have a position of advantage. Officers should use this opportunity to conduct a visual assessment of the occupants. It is important for officers to be aware of their surroundings and strategically use the environment they are in to determine the best placement for these individuals. For example, they may guide them to the sidewalk or walk them back to officers who are behind cover and in a protected position. The priority is to consistently maintain a position of advantage, ensuring the safety of both the officers and the involved individuals throughout the investigation.

The occupants should not be ordered to lay face down on the ground during these types of stops unless the circumstances change and there are articulable reasons justifying this tactic. Once all occupants are outside of the vehicle, officers should conduct a visual search of the interior of the vehicle for any other occupants that may be hiding, before engaging with the occupants and continuing their investigation.

Note: Tactics are fluid and officers should be prepared to transition to a high-risk stop if the circumstances change.

Considerations for High-Risk Stops

Although the vehicle stop of a suspected stolen vehicle might begin as a tactical investigative stop, there are several tactical considerations that may lead to the elevation of an encounter from an investigative stop to a high-risk stop. These considerations include, but are not limited to:

- Suspect(s)/Occupant(s) yelling threats of violence,
- Stolen vehicle believed to have been involved in a recent violent crime (Robbery, Assault with a Deadly Weapon),
- Suspect known to officers having a history of violence against police,
- Stop conducted after a vehicle pursuit involving a vehicle demonstrating disregard for the safety of the public (e.g., excessive speed, running red lights, or not slowing/stopping for crowds and/or pedestrians),
- Suspect(s)/Occupant(s) refusing to follow officers' directions,

Note: Officers should, as clearly as possible given the situation, verbalize commands, which, if not followed, can lead to further articulation of a high-risk stop.

- Suspect(s)/Occupant(s) apparently concealing items,
- Items observed in the vehicle (e.g., weapons, dangerous contraband),
- Suspect's/occupant's known parole or probation status (with search conditions),
- Suspect/occupant is known to carry or conceal weapons inside their vehicle.

Articulating High-Risk Stops

During or after any situation involving a high-risk stop on a suspected stolen vehicle, officers should articulate the reasons for the high-risk stop on Body-Worn Video and/or Digital In-Car Video, when it is safe and practicable to do so. Additionally, officers should review any video of the encounter and note any and all articulable facts leading to the decision for a high-risk stop in subsequent documentation (e.g., Arrest Report).

CONCLUSION

Per the Department, officers are not allowed to conduct a high-risk stop based *solely* on reasonable suspicion that a vehicle is stolen. Officers may utilize high-risk stop alternatives to maintain a tactical advantage during an investigative stop of a stolen or cold-plated vehicle. Should the articulable facts and the totality of the circumstances lead officers to a reasonable belief that there is a risk of serious injury to the officer and/or the public, a tactical investigative stop can transition to a high-risk stop. These tactical considerations will help to fulfill our core values of “Respect for People” and “Reverence for the Law.”

Field Training Services Unit
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