

IOLERO

Annual Report 2024-2025



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Executive Summary

This year at IOLERO, we had some significant achievements, and some challenges.

One of our auditors left IOLERO this year, so we were short staffed for most of the year. This led to an increase in our case backlog. On the other hand, we were able to hire a new Chief Deputy Auditor (a new position for IOLERO) and a new auditor to replace the one who left. Altogether, we moved from one full-time auditor and one part-time auditor to three full-time auditors and one part-time auditor. Together with our Director, IOLERO's auditors now have more than thirty (30) years of oversight experience.

Our independent investigations continued this year. By the time this report is released, you'll be seeing the results of our investigation into the death of David Peláez Chavez which will be covered in our next annual report since it concluded in Fiscal Year 2025–2026. This report details the results of two investigations into deaths in the jail. We also pioneered, in collaboration with the Sheriff's Office, processes for issuing and serving subpoenas. On the other hand, our access to information at the Sheriff's Office was not sufficient to complete some of our independent investigations. We're still in court seeking enforcement of our subpoenas in a whistleblower case, which we expect will resolve in the next fiscal year.

In our auditing work, we saw the investigations by the Sheriff's Office improve. Those investigations were complete more often than in the past, largely due to our Completeness Checklist and increased Sheriff's Office follow up in response to our audit work. We started assessing timeliness this past year and saw improvement in the Sheriff's Office completing investigations within the one-year time limit imposed by law. On the other hand, we found our own work at IOLERO was completed too slowly. We're looking forward to our increased staffing this next year helping with our own timeliness.

At the Community Advisory Council, improved planning at the beginning of the year resulted in strong productivity. You'll see in the note from the Chair and Vice-Chair below a note about the policy issues they worked on this year, including the Racial and Identity Profiling Act (RIPA), canines, community engagement, and immigration issues, among others. Language access has improved as we've provided live Spanish language translation at Community Advisory Council meetings for members who speak Spanish, and Spanish-language training and policy materials.

We're looking forward to our feedback on our work from this past year, and for doing even more for you next year.

Message From the Community Advisory Council Chair And Vice-Chair

As we have in previous years, the Community Advisory Council (CAC) saw a number of membership changes during the 2024-2025 fiscal year. In an effort to better prepare for vacancies, the CAC revised its Bylaws to urge any member who decides to resign from the CAC to give notice at least three months before the effective date of resignation. The CAC and public hope that a better understanding of the expectations of CAC members will help potential applicants understand the obligations of appointment. At the time of this writing, the CAC is comprised of the following appointees: Robin Jurs and Nathan Solomon, District One; David Jones, District Two; Lorena Barrera and Trevor Ward, District Three; John Azevedo and George G. Miller, District Four; Imelda Martinez De Montano and Nancy Pemberton, District Five; and Alberto Botello, At Large.

In February 2025, the CAC held its third Strategic Planning Workshop to plan its work for calendar year 2025. Sonoma County Sheriff Eddie Engram addressed the CAC members and the public. With input from the public, the CAC decided to retain several of its ad hoc committees from 2024. The CAC and public also looked at the policy shifts on immigration enforcement operations taking place on a national level and discussed ways the CAC could help protect the public and enhance trust between law enforcement and the community. This discussion resulted in the creation of a new ad hoc committee focused on improving engagement with the community about the SCSO policies related to interactions with Immigration and Customs Enforcement (ICE). Lastly, the CAC agreed that defining SMART (Specific, Measurable, Achievable, Relevant, and Time-Bound) goals for every ad hoc committee was important in order to focus more on concrete results for 2025. The result of these discussions and decisions is reflected in the [2025 annual workplan](#) which was officially adopted in April.

As part of the unfinished work continuing in 2025, the RIPA Ad Hoc Committee presented a draft of its RIPA Report at CAC's March regular meeting and, after a long discussion and gathering input from the public, the CAC approved the submission of the RIPA Ad Hoc Report as an official recommendation of the CAC to the SCSO. The RIPA Ad Hoc Committee also engaged the Sheriff in a discussion of the findings and recommendations that were included in the [RIPA Report](#). Thoughtful and positive conversation was held with Sheriff Engram leading to his commitment on creating a policy specific to RIPA data collection for the SCSO.

The Canine Policy Ad Hoc Committee also continued its review of the SCSO canine program. At CAC's June meeting, the Canine Policy Ad Hoc Committee presented a draft of the proposed policy recommendations. The CAC held a very engaged conversation around this topic resulting in further engagement from the SCSO with the Canine Policy Ad Hoc Committee to discuss and conduct a thorough review of the current canine program. After gathering necessary input, the Canine Policy Ad Hoc Committee will finalize its policy recommendations for CAC consideration and possible adoption in the 2025-2026 fiscal year.

An important part of CAC's work is to engage the community in the work of the CAC and to improve the understanding of the public of the work of the SCSO. To that end, the Community Engagement Ad Hoc Committee enhanced its efforts to improve the CAC's outreach and engagement. One result of those efforts is the approved Manual/Standard Operating Procedures, or "CAC playbook" for tools and techniques commonly used by the CAC (and oversight agencies in general) to guide members as they do the work. In addition, this Committee successfully scheduled Chair Lynda Hopkins, (5th District) Member of the Sonoma County Board of Supervisors to address the CAC and public at the CAC's April meeting. The Community Engagement Ad Hoc Committee is committed to improving public awareness of CAC and IOLERO through bilingual video content and technology at outreach events.

The CAC is very pleased with the current staff of IOLERO and would like to highlight the fact that without the assistance and support of Director John Alden and Community Engagement Manager Lizett Camacho, it would be quite difficult for the CAC to plan, schedule, organize and implement its work. Finally, the entire IOLERO staff is to be commended for its continued efforts to implement the goals of Measure P: civilian oversight of, transparency by, and community engagement with the Sheriff's Department.

I. Brief History of IOLERO And Measure P

As noted in prior annual reports, IOLERO began in 2016, following the tragic death of Andy Lopez, a 13-year-old boy, in a Deputy-involved shooting. IOLERO was initially created by the Sonoma County Board of Supervisors based on a recommendation of the CALLE Task Force, a group formed by the Board of Supervisors to recommend ways to improve the community-law enforcement relationship.

In the fall of 2020, the Board of Supervisors placed Measure P on the ballot to significantly expand IOLERO's powers and duties. In November 2020, County voters approved Measure P with nearly 65% of the vote. Since that time, the County and IOLERO have worked with the SCSO and applicable labor organizations to implement Measure P, work which continues to this day.

In this report, one can see that IOLERO continues to build many of the new powers in Measure P, including independently investigating deaths resulting from actions of a deputy, independently investigating deaths of persons in custody, and independently receiving and investigating whistleblower complaints. IOLERO also continues to build the subpoena power Measure P provided in order to conduct these investigations.

II. IOLERO'S Budget and Staffing

IOLERO entered the 24-25 Fiscal Year with a budget of \$2,409,477. This included a newly created Chief Deputy Law Enforcement Auditor position. IOLERO's budget modestly surpassed the funding mandate of the equivalent of 1% of the SCSO 24-25 Fiscal Year budget of \$239,959,287.

In addition to the Chief Deputy position, the Board of Supervisors also approved IOLERO's request to increase its position allocation to add a .5 full-time Law Enforcement Auditor to support completion of audits and ongoing investigations. IOLERO had been utilizing the services of an Extra Help Law Enforcement Auditor since June of 2023 on a temporary basis, so this change made permanent an experimental staffing model we had tried the prior year.

With the two new added positions, IOLERO entered the fiscal year with eight permanent positions, six of them staffed. Recruitments were conducted for the new positions as well as for a Law Enforcement Auditor position that became vacant mid-year due to a resignation. IOLERO closed out the 24-25 Fiscal Year with two of these positions staffed and one with a candidate to come onboard shortly after the start of the 25-26 Fiscal Year. This gave IOLERO the largest auditing staff ever at the close of the Fiscal Year.

As IOLERO welcomes newcomers to the team, we also realize the importance of continuing to develop institutional knowledge through employee retention. We are proud to report that we now have a group possessing a range of two to six years with the department, several of whom are also long-time County employees. Historically, IOLERO seldom had employees stay more than two to three years, so this long-term retention is a new and positive trend.

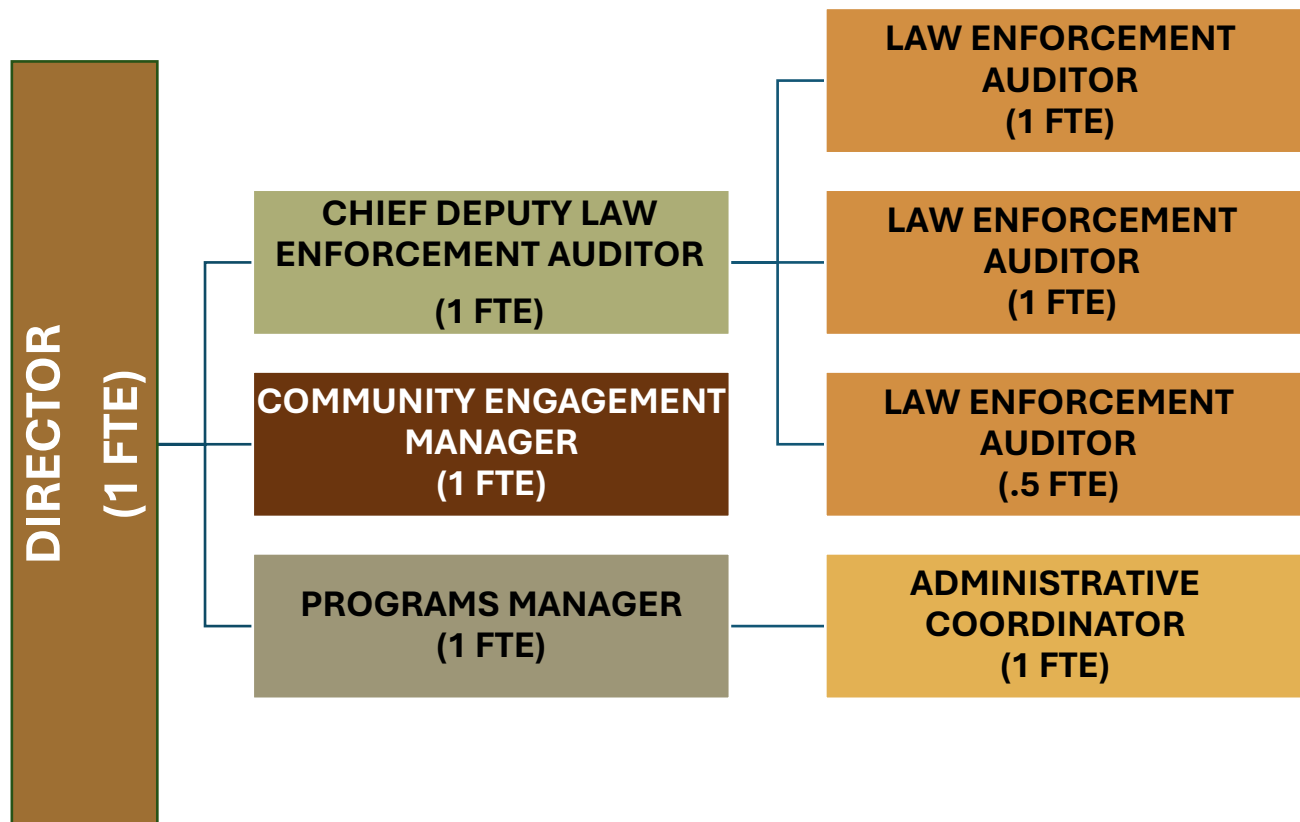
As we say goodbye to the 24-25 fiscal year, we also want to acknowledge the support we have received through the years of our .2 full-time Administrative Services Officer, who we shared with the County Executive and Office of Equity, and whose focus now turns fully to the County Executive's Office. Her support has been instrumental through the years, and we are grateful.

Since its establishment as a County Department in 2016, IOLERO has experienced multiple shifts in its administration and workforce. From its early days of two staff - a director and an administrative

aid, to the development of the Law Enforcement Auditor job classification series, initial reliance on extra help auditors, changes in administration, restructuring of administrative duties, and adding of positions, IOLERO may finally be settled into a structural stability that will strengthen our ability to fully embrace Measure P authorities, explore new avenues of community engagement, refine internal processes, and continue our development as law enforcement oversight professionals.

Information about IOLERO's budget for this new fiscal year can be found by viewing the County's Fiscal Year 2025-2026 Recommended Budget at: <https://sonomacounty.ca.gov/administrative-support-and-fiscal-services/county-administrators-office/budget-and-operations/budget-reports>.

Figure 1: IOLERO Organizational Chart as of July 1, 2025



A. Auditor Team

The Law Enforcement Audit Team is central to fulfilling IOLERO's mandate to provide objective, independent, and appropriate civilian oversight of the SCSO. The Audit Team is tasked with auditing internal investigations, reviewing policy and training practices, conducting independent investigations into critical incidents such as deputy-involved-shootings and in-custody-deaths, and making thoughtful recommendations for improvement.

Led by the Chief Deputy Law Enforcement Auditor (a new position authorized by the Board of Supervisors, and filled, for the first time this year), the team consists of three experienced Law Enforcement Auditors, each with a background tailored to the rigorous demands of oversight. In addition to handling a caseload of investigations and audits, the Chief Deputy is responsible for coordinating the team's case assignments, maintaining relationships with internal and external stakeholders, developing strategic goals, and ensuring that IOLERO's oversight efforts align with legal mandates and community expectations. The Law Enforcement Auditors work both independently and collaboratively, leveraging their combined expertise to conduct thorough, legally sound, and impactful investigations and audits.

Together, the team provides IOLERO with a professional and diverse skill set needed to ensure that investigations are thorough, unbiased, and guided by best practices in policing, policy, and public integrity. The audit team collectively brings outstanding expertise in law enforcement oversight and a shared commitment to accountability, neutrality, and systemic improvement.

Michael Soto – Chief Deputy Law Enforcement Auditor

Michael Soto leads the audit team and serves as the principal liaison between IOLERO and SCSO. His oversight experience is rooted in his previous role as a Police Special Investigator with the Los Angeles Police Commission's Office of the Inspector General. There he conducted reviews of internal investigations, policy practices, and critical incidents such as officer-involved shootings; and independent misconduct investigations alleged against LAPD's Chief of Police. Michael also currently serves as an appointed commissioner on the City of Long Beach's Police Oversight Commission, which is a role similar to that of CAC members.

Michael's training includes both qualitative investigative methodologies and legal evaluation of police conduct. He brings a strong foundation in administrative and disciplinary review, particularly for high-risk cases involving allegations of misconduct, civil rights violations, and systemic policy concerns. Michael regularly attends trainings and certifications offered by the National Association for Civilian Oversight of Law Enforcement (NACOLE), the Association of Inspectors General (AIG), and other state and local organizations. Michael will become a Certified Inspector General through AIG in August 2025.

His earlier work as a Deputy Public Defender and Police Officer Recruit further strengthens his understanding of due process, legal accountability, and the procedural rights of public employees and civilians alike. His experience across multiple jurisdictions informs his approach to objective audits and actionable recommendations.

Matthew Chavez – Law Enforcement Auditor III

Matthew Chavez brings deep expertise in legal and policy oversight, with a particular emphasis on auditing complex administrative investigations and detention facility operations. At IOLERO, he leads audits of Internal Affairs investigations, including use-of-force incidents, canine deployment

and apprehension, and in-custody deaths, along with independent investigative reviews of in-custody deaths occurring at the detention facility. He also develops in-depth policy analysis on patrol and jail operations, drawing on a career that includes regulatory investigations, federal litigation, and financial audits.

Matthew is a Certified Practitioner of Oversight (CPO) through NACOLE, is slated to become a Certified Inspector General Auditor through AIG in August 2025 and has completed POST-certified training in performance auditing and law enforcement investigations. His focus on best practices in jail oversight includes compliance with Title 15 Minimum Standards For Local Detention Facilities, the Prison Rape Elimination Act, National Commission on Correctional Health Care standards, and constitutional requirements for inmate care and safety.

His legal and investigative background enables him to evaluate the sufficiency and integrity of internal investigations, identify systemic gaps, and draft detailed reports that meet both legal and policy standards.

Emma Dill – Law Enforcement Auditor III

Emma Dill brings nearly a decade of direct experience in civilian oversight of law enforcement. At IOLERO, she independently investigates deputy shootings and other matters and specializes in complex audits of use-of-force investigations, misconduct complaints, and internal policy reviews. Emma developed a strong foundation during her tenure at Oakland's Community Police Review Agency, where she led more than seventy (70) investigations into issues such as officer dishonesty, racial bias, sexual misconduct, excessive force, and failure to supervise.

Emma has been instrumental in developing IOLERO's internal procedures for conducting death investigations and handling whistleblower complaints, including writing protocols that ensure consistency and fairness. Her oversight training includes DEI-informed frameworks for investigating racial bias and sexual misconduct complaints; POST-certified training in crisis intervention techniques and conducting law enforcement investigations; and skills development in interviewing and credibility assessments. Emma is also active with NACOLE and will become a Certified Inspector General Investigator through AIG in August 2025.

Anchored by an impressive legal education and legal work in employment law and litigation, Emma brings sharp analytical skills to her independent investigations of complex incidents. Her clear, detailed reports and neutral investigative stance support IOLERO's goals of objectivity and credibility in its oversight role.

Ashley Nechuta – Law Enforcement Auditor III (Starting August 2025)

Ashley Nechuta will join IOLERO in August 2025, bringing a rare combination of experience as a former police officer, attorney, and a seasoned oversight investigator. She has conducted complex, high-impact investigations at both the San Francisco Department of Police Accountability and Oakland's Community Police Review Agency, including officer-involved shootings, high-profile use-of-force cases, protest response reviews, allegations of biased policing, and detention-related investigations.

Ashley's training includes POST-certified police academy graduation (top of her class), as well as investigative training in evidence gathering, officer interviews, and legal analysis of department policies. Her experience as a former Field Training Officer gives her a real-world understanding of

patrol practices and use-of-force protocols, boosting her ability to objectively evaluate and conduct investigations.

Ashley supplements her experience with training through police oversight organizations, such as the California Civilian Oversight Alliance and NACOLE, while also working to be a leader for our LGBTQ+ community. Her legal education, combined with field experience and oversight expertise, makes Ashley uniquely qualified to examine SCSO practices with clarity and credibility.

Oversight with Integrity

Every member of the Law Enforcement Audit Team brings specialized knowledge in civilian oversight, administrative investigation, and policy analysis. Their training and experience allow IOLERO to conduct high-quality audits and investigations that are independent, evidence-based, and aligned with best practices in public accountability.

Together, the team ensures that IOLERO continues to build public trust and promote integrity, fairness, and transparency in the policies and practices of the SCSO.

B. Administrative Team

IOLERO's administrative team is made up of a Programs Manager with 25 years of County service, 6 of them with IOLERO, and an Administrative Coordinator with 12 years of County service, 2+ of them at IOLERO, and who is bilingual English-Spanish. Collectively, they also bring a broad range of educational and professional achievement to the table, such as:

Bachelor of Arts in Communication Studies, California State University Sacramento

Associate of Science in Social and Behavioral Sciences, Santa Rosa Junior College

Associate of Arts in Liberal Studies, Santa Rosa Junior College

Juvenile Correctional Counselor Core certificate, Santa Rosa Junior College

Coursework in administration of justice, accounting principles, tax preparation, real estate, and business administration at Santa Rosa Junior College

NACOLE Certified Practitioner of Oversight

County of Sonoma Human Resource Liaison Training, Spring-Summer 2024

IOLERO's administrative team members have also each earned their **Professional Administrative Certification of Excellence (PACE)** through the American Society of Administrative Professionals (ASAP). This program requires study in four core areas – Interpersonal Communication, Task and Project Management, Computer and Internet Technology, and Management Skills. The program also requires ongoing training for recertification every two years.

Administrative responsibilities include human resources and payroll duties, budget preparation and management, contract preparation and management, complaint intake and tracking, database management, preparing safety and health plans and conducting trainings, supporting preparation of IOLERO's annual report, establishing work processes, and "other duties as assigned."

III. Outreach, Access, And Engagement

IOLERO's Community Engagement Manager, Lizett Camacho, has 18 years of County service and is nearing her third year with IOLERO. She previously worked doing outreach to unhoused populations in Sonoma County. Her credentials include:

Bachelor of Arts in Criminal Justice Administration, Sonoma State University

Leadership Santa Rosa class 37 completion

Los Cien BRIDGE Cohort 1 completion

U.C. Davis Mediation Certification

Professional Administrative Certification of Excellence (PACE)

Her responsibilities include establishing outreach work processes, planning for and tabling at community events; providing support to the Community Advisory Council, including meeting planning, agenda and minute preparation, support to ad hoc committees, translation, and supporting preparation of IOLERO's annual report, among other duties. This section details the work she coordinates for IOLERO and the CAC.

A. Outreach

IOLERO continues to engage in community outreach activities within Sonoma County. The purpose is to document engagement efforts, assess impact, and inform future outreach planning to better serve our community.

Objectives:

- Increase public awareness of IOLERO, audits, policy recommendations and the complaint process.
- Engage underrepresented communities
- Gather feedback to inform
- Build trust and relationships with community partners

The goal of community outreach is to engage diverse community members, ensure equitable access to services and information, and create opportunities for meaningful participation in decision-making processes.

Some examples of IOLERO's outreach work in 2024-2025 included: Wednesday Night Market tabling, Mochilada at Roseland, Vince Harper's South Park Day & Night Festival, Sueños Market, Luther Burbank Center's Fiesta de Independencia, Andy Lopez Annual Memorial, Andy Lopez's Posada, presentation at the Graton Labor Center. Windsor's 23rd Annual Holiday Celebration, Environmental Justice Program Day with Los Cien, Dia del Niño with La Maquina Musical Radio, SCSO Meet & Greet Event, 5 de Mayo Event in Sonoma, Immigration Update with Los Cien, NAACP Hive Rededication, Sonoma County Pride Festival, Sonoma-Marin Fair in Petaluma.

Other community events that our Community Engagement Manager, Lizett Camacho attended were Charlas with elected officials, which were hosted by Los Cien. Some of those elected officials were Sylvia Lemus, Vice Mayor of Cotati, Andres Marquez, Mayor of Cloverdale, Congressman Mike Thompson, Congressman Jared Huffman, and Member of the California State Assembly Chris

Rogers. Many of our IOLERO staff and CAC members also attended these events to help spread the word about our work.

We remain committed to meaningful and culturally responsive community engagement. These outreach efforts strengthen our understanding of community priorities and support our mission to strengthen the relationship between the SCSO and the community it serves.

B. Access

At IOLERO, we are committed to ensuring that all individuals, regardless of their primary language, have meaningful access to our services. We recognize the importance of clear communication in promoting equity, inclusion, and effective service delivery. Our goal is to foster an inclusive environment where everyone feels respected, heard, and empowered to engage fully.

To achieve this, we:

- Offer interpretation services for individuals with limited English proficiency to fully participate in meetings, events, and services.
- Provide translated materials in the most requested language within our community to enhance understanding of critical information, [including a Spanish-language version of our website](#).
- Collaborate with community partners and cultural organizations to identify language needs and address barriers to access.

We are happy to share that this past fiscal year 2024-2025, we've had our very first monolingual community member join the Community Advisory Council (CAC). Imelda Martinez De Montano was appointed by the Board of Supervisors (BOS) Chair Lynda Hopkins from District 5. Mrs. Martinez De Montano has volunteer experience as a Health Promoter in the Russian River area. She enjoys contributing her service with helping the Latinx community. Mrs. Martinez De Montano joined the CAC to learn about the important work law enforcement oversight entails and to bring this educational information to her Latinx community. We are honored to have Mrs. Martinez De Montano bring her lived experience and perspective to the CAC. Her participation strengthens our council's ability to represent the diverse voices of Sonoma County.

IOLERO is honored to lead the way as the first county department to facilitate full language access by providing translation services for our first monolingual community member serving on an advisory council. We hope this serves as a model for other departments to prioritize language access and representation in their boards, commissions, and councils. Everyone deserves a seat at the table, regardless of the language they speak, and we are committed to ensuring this is not just a moment, but the beginning of systemic change across the county. As we continue this work, we invite community members to share feedback on how we can further strengthen our language access practices to better serve Sonoma County's diverse communities.

C. Engagement

Just recently, we have expanded our efforts to produce our newsletter twice a month and continue working with Watzalab to make this happen more efficiently. To do this, we work with the Community Advisory Council (CAC) as well as Watzalab to create a newsletter that can also be

shared on social media platforms such as Facebook and Instagram. We find that posting on social media with more frequency helps increase public traffic to our social media pages.

We also worked with the CAC to expand the CAC's small working groups, called Ad Hoc Committees, to include interested members of the public, not just CAC members. One of the new ad hoc committees has been the Community Engagement on ICE ad hoc, which continues to work on providing resources to individuals facing immigration issues. One of the CAC ad hoc committees that completed its work and has since dissolved was the Recruitment and Hiring Committee. You can find the ad hoc committee's work plans here: [CAC Annual Work Plans](#). Looking ahead, we hope to expand future ad hoc groups and ensure they engage directly with the public—not only to share information, but to invite participation in their work.

Community engagement this year went beyond attendance at events—it was about building trust, listening deeply, and creating pathways for community members to see their voices reflected in our work. Through new partnerships, expanded language access, and direct feedback loops, we strengthened our connection with diverse communities. These efforts not only increased visibility but also informed our recommendations and priorities for the coming year.

We extend our deepest gratitude to our departing CAC members, Esther Lemus, George Valenzuela, and Darnell Bowen for their dedicated service. Their leadership, insight, and commitment to community engagement have left a lasting impact on the Council's work. We honor their contributions and wish them continued success in their future endeavors.

Our ongoing work would not be possible without the dedication of our current CAC members. Each member brings unique perspectives, skills, and lived experience, shaping our discussions and ensuring our efforts are community-driven. Their commitment to public service is the backbone of the Council's success, and we are honored to recognize and thank them for their continued engagement.

IV. IOLERO's Independent Investigations

A. In-Custody Deaths

As discussed in the 2023-2024 Annual Report (p. 42), IOLERO conducted independent investigative reviews of in-custody deaths. "In-custody" can mean that when a person died, they either (i) were in the custody of an SCSO officer (e.g., under arrest) or (ii) were incarcerated at the Main Adult Detention Facility (MADF).

The causes of in-custody deaths vary. Some are the result of natural causes (heart attack, stroke); others may be the result of drug overdoses; others might involve officer use of force; others may be the result of self-harm.

IOLERO's 2024 independent investigative reviews concerned two in-custody deaths that occurred at the MADF. One was a suicide and the other was the result of a pre-existing medical condition. IOLERO's findings and recommendations for each investigative review are summarized in more detail later in this Report.

This section highlights a couple of points.

First, in-custody deaths at the MADF trigger a complex series of reviews and information reporting requirements. (See discussion in the 2023-2024 Annual Report at p. 44 for more detail and recent

changes to California law in this regard). The 8th and 14th Amendments to the U.S. Constitution also prohibit detention staff from being “deliberately indifferent” to the serious safety and medical needs of incarcerated persons. Among other things, a death in a detention facility raises issues of (depending on the circumstances) the level of medical screening conducted by the detention facility staff (including medical and mental health practitioners), documentation of medical issues, appropriate housing placement based on documented medical or mental health issues, and the adequacy of safety checks of those with identified medical or mental health issues.

IOLERO reviewed these factors in its independent reviews. However, with respect to medical care, IOLERO reviewed only the question of *access* to care. IOLERO did not review the substance or *adequacy* of care provided or the clinical decisions made by trained medical or mental health staff. Such clinical evaluation is presently beyond IOLERO’s expertise and resources.

Second, Critical Incident Protocol 93-1 to which SCSO and other law enforcement agencies in Sonoma County have subscribed, designates SCSO’s Patrol Division as the agency to criminally investigate deaths occurring at the MADF. Designating an agency to investigate itself generally raises an “appearance” of conflict of interest, even if an actual conflict is not presented. IOLERO reviewed this issue and found that there was no actual conflict of interest in having SCSO’s Patrol Division investigate deaths in the MADF. The two divisions are administratively separate from each other (with separate lines of reporting) and SCSO has a mechanism for referring such an investigation to a third party if an actual conflict were to arise. IOLERO did not identify an actual conflict in the matters it reviewed and concluded that, as structured, the investigatory process for deaths at the MADF under Critical Incident Protocol 93-1 was reasonable. Nevertheless, given the inherent appearance of conflict, and the increased risk that an actual conflict of interest could arise in this specific circumstance, IOLERO recommended that SCSO proceed cautiously and with care when conducting the criminal review in these types of cases.

Historically an investigation into an in-custody death in a detention facility was not publicly disclosable. Effective July 1, 2024, SB 519 (codified at Penal Code § 832.10) makes such investigations conducted by the *detention* facility publicly disclosable. Here in Sonoma County, this means the SCSO investigation into the death is publicly disclosable, but IOLERO’s investigation is not, so our reports in these cases won’t be on our website.

B. Deputy-Involved Shootings

IOLERO finished its investigation into the shooting of David Peláez Chavez after the end of the 2024-2025 reporting period, but before we released this Annual Report. As a result, that case will appear in next year’s report. In the meantime, you can find information about our investigation on the IOLERO website: <https://sonomacounty.gov/administrative-support-and-fiscal-services/independent-office-of-law-enforcement-review-and-outreach/audits-and-investigations>

C. Whistleblower Complaints

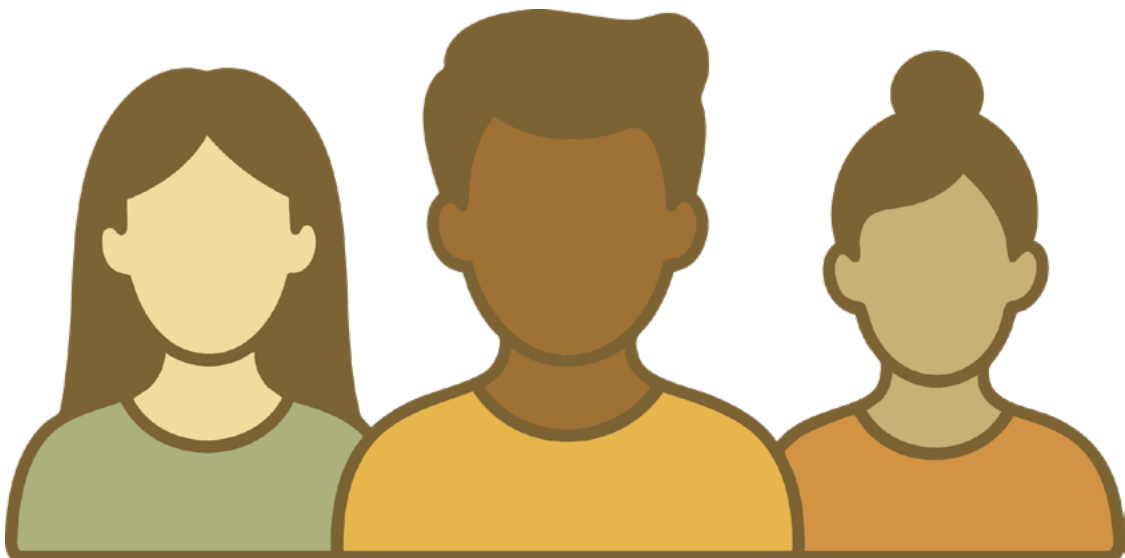
Measure P provides that IOLERO “[a]ct as a receiving and investigative agency for whistleblower complaints involving the sheriff-coroner.” IOLERO has received such complaints and begun

investigating them. That said, when we first issued subpoenas to gather information from the SCSO in these matters, the SCSO declined to honor them. We've been in litigation since to have those subpoenas enforced. [That litigation is now before California's First Appellate District, case number A171763.](#) We anticipate a decision in the next fiscal year.

D. Investigative Interviews

Last year, IOLERO created a new process to subpoena SCSO records and interviews. With help from the Sheriff and County Counsel, we implemented procedures that avoid unnecessary costs to the County and that apply to all future subpoenas. We issued our first subpoenas last year. Section C (above) discusses the ongoing dispute regarding some of those subpoenas.

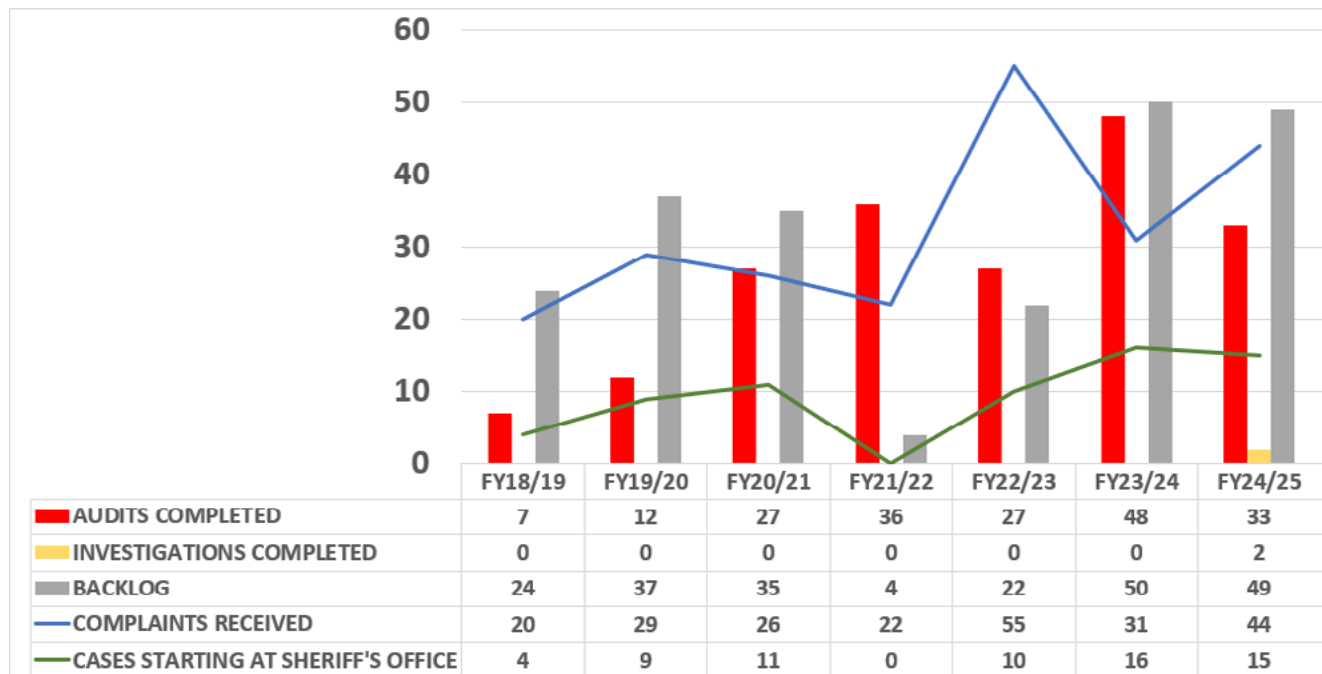
This year, we conducted our first interviews using the subpoena process. Those interviews – part of our investigation into the shooting of David Peláez Chavez – will be covered in our analysis of that investigation in the next annual report.



V. IOLERO By the Numbers: Complaints Received and Investigations Audited In 2024-2025

Complaints and Audits for Fiscal Year 2024-2025

- IOLERO received 44 complaints. Of these, 13 were processed through the inmate grievance system and 2 were resolved without investigation.
- IOLERO received 37 cases from the SCSO for audit. Of these, 20 were cases that originated at IOLERO and 17 were cases that originated at the SCSO.
- IOLERO completed 33 audits and 2 independent investigations. These investigations/audits included a total of 69 allegations.
- IOLERO received 155 other instances of public contact that required follow-up, including complaints about other law enforcement agencies, other County departments, or other matters. Of these contacts, 147 were received in English and 8 were received in Spanish.



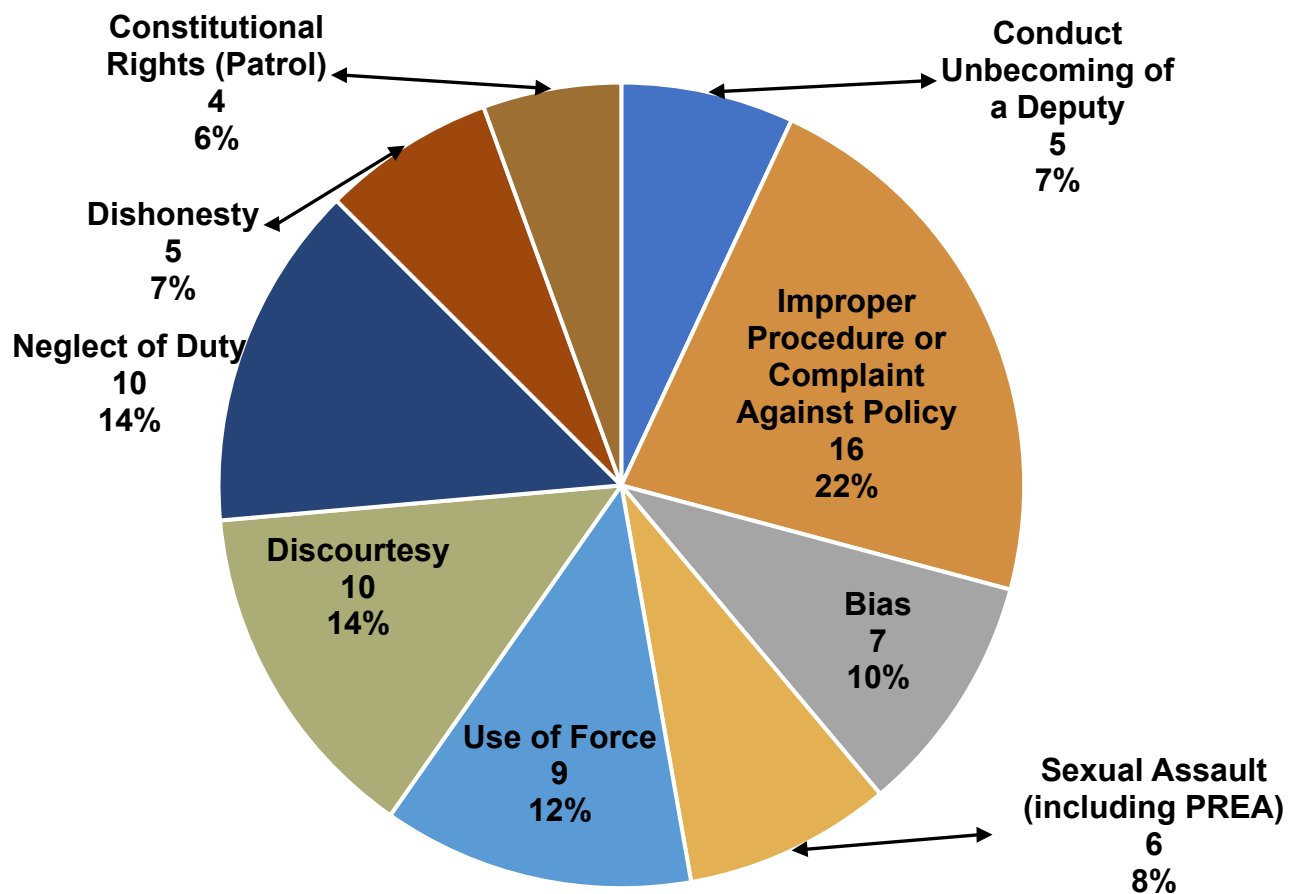
SCSO investigations that originated at the SCSO and were sent to IOLERO to be audited fell into four general types: Administrative Review (“AR”), Internal Affairs Administrative Investigation (“IA”), Policy and Procedure investigations (“PP”), and Citizen Complaint Administrative Investigation (“C”).

Type	Number
Administrative Review (AR)	2
Internal Affairs (IA)	6
Policy and Procedure (PP)	2
Citizen Complaint (C)	5
Unknown	2
Total cases originating at SCSO	17



Breakout of Investigated Allegations by Type

Allegation	Quantity	Percentage
Conduct unbecoming of a Deputy	5	7%
Improper Procedure or Complaint Against Policy	16	22%
Bias	7	10%
Sexual Assault (including PREA)	6	8%
Use of Force	9	12%
Discourtesy	10	14%
Neglect of Duty	10	14%
Dishonesty	5	7%
Constitutional Rights (Patrol)	4	6%
Total Allegations Investigated/Audited	72	



Race and Ethnicity of Complainants

IOLERO's complaint form asks complainants about their race or ethnicity, as well their gender and any disabilities. We do this because complainant demographics can help IOLERO and SCSO improve processes and better understand community concerns. Analyzing this information over months or years can help us understand how different communities use the IOLERO/SCSO complaint processes; where we may be able to provide more meaningful outreach and engagement; and whether different communities have different concerns about their interactions with SCSO. This is meaningful feedback.

Of course, IOLERO complainants always have the choice *not* to provide their demographics. We also audit many investigations where the complainant was never asked for this information. For example, SCSO doesn't ask complainants about their race or ethnicity; and it's common for IOLERO to receive complaints that don't use IOLERO's form. As a result, each year there are gaps in the data that IOLERO receives.

This report doesn't try to fill in those gaps. Instead, we only report the information that complainants chose to provide during this reporting period. We also report how many complainants chose not to share their information with us (we call that "Declined to State") and how many were never asked for it (we call that "Unknown").

For this reporting period, IOLERO audited 33 investigations. The complainants' race and ethnicity broke down as follows:

Hispanic/Latine(x): 3

Native American: 2

White: 5

Declined to State: 5

Unknown: 18¹

It's important to know that IOLERO *never* uses this information when evaluating complaints or cases. Regardless of the complainant's race or ethnicity, we handle all complaints and cases according to the same internal procedures. We don't treat complainants differently based on their race or ethnicity – or based on their choice to not disclose that information to us. We also don't make decisions based on race or ethnicity when sending complaints to SCSO or when conducting audits. The same things are true when it comes to gender, disability, and complainants' other personal information.

VI. Completeness, Timeliness, And Findings In 2024-2025

¹ IOLERO uses terminology from the Racial and Identity Profiling Act (RIPA) to describe complainant demographics. For race and ethnicity, the RIPA categories are: Asian, Black/African American, Hispanic/Latine(x), Middle Eastern or South Asian, Native American, Pacific Islander, and White. You can learn more about what these categories mean in the RIPA regulations – California Code of Regulations section 999.226. You can learn more about why IOLERO uses RIPA's terminology in our 2023-2024 Annual Report (pages 32-33). Two of our 2024-2025 audits didn't involve a complainant; for those cases, we report the race or ethnicity of the involved individual.

A. Completeness

For each audit, we evaluated whether SCSO performed a “complete” investigation – meaning, was SCSO’s investigation sufficiently thorough to establish a complete factual and analytical record on the allegations presented. We implemented the following completeness categories this year:

Complete: This means that SCSO did a complete investigation of all allegations.

Partially Incomplete: This means that SCSO did a complete investigation of some allegations, but there was at least one allegation that was *not* sufficiently investigated.

Incomplete: This means that all allegations were insufficiently investigated.

For the investigations we audited this year, we concluded that 24 of the 33 investigations were Complete (around 73%). This was a significant increase from the rate we reported last year (66%). This increase was attributable to SCSO’s increased engagement over the last year – more than ever before, SCSO responded to our audits with additional investigation, explanations, or evidence that allowed us to change our preliminary “Partially Incomplete” finding to a final finding of “Complete.” We discuss SCSO’s increased engagement in the **SCSO Cooperation Trends** section below.

Of the 9 investigations that we concluded were *not* Complete this year, only 1 was fully incomplete. This is similar to the percentage we reported last year.

Of those 9 investigations, 5 were Incomplete or Partially Incomplete because SCSO didn’t sufficiently investigate an allegation that was the complainant specifically raised. The other 4 only involved discovered allegations – issues that SCSO decided to investigate on its own, or that we concluded SCSO should have investigated.

The **CASES AUDITED BY IOLERO** section below provides audit-by-audit summaries of our completeness findings.

B. Timeliness

This past year, we used a Timeliness Checklist constructed in collaboration with the SCSO to assess the timeliness of investigations. This checklist assesses several kinds of Timeliness.

First, it assesses whether the original SCSO investigation into the matter was completed within California’s statute of limitations for completion of administrative investigations of law enforcement officers. (Government Code section 3304.) Investigations completed after that deadline cannot be used as the basis for disciplining a deputy, so completion before that deadline is a widely recognized best practice.

Second, the Timeliness Checklist assesses whether SCSO transmitted their completed work to IOLERO promptly, such that IOLERO could complete the audit in a prompt fashion, and also within the one-year time limit set by law for discipline to be imposed. While IOLERO’s *audit* is not required by law to be completed within that year, if our audit persuaded the Sheriff to impose discipline, the one-year deadline would apply to the Sheriff’s decision. So as a practical matter, we would prefer to complete our work within that same one-year period.

Finally, the Timeliness Checklist also assesses whether *IOLERO* finished our auditing work promptly. We set for ourselves a 120-day deadline for this purpose. While that deadline is not set by law, we felt it reflected consensus among oversight professionals for a prompt turnaround.

We only applied this Timeliness Checklist on cases started from February 2024, forward, so most of the cases in this report were not subject to this Timeliness Checklist. In sum, a total of five cases were subject to the Checklist.

Of these five matters, SCSO met the Timeliness Checklist in all respects in four (4) matters and missed one of the Timeliness guidelines in one (1) matter. Conversely, *IOLERO* missed its Timeliness guideline (requiring completion of the audit within 120 days of receiving the matter) in all five (5) matters. *IOLERO*'s failure here was largely due to losing one auditor during the year, leaving us down to only 1.5 full time auditors for almost nine (9) months. We focused heavily on recruiting and hiring this year, and added a new Chief Deputy Auditor position, such that in the next fiscal year we will have 2.5 full time auditors and one (1) full time auditor who is also a supervisor. This increase in staffing should help us ensure our audits are completed in a timely way.

In cases audited by *IOLERO* that were not yet subject to the Timeliness Checklist, SCSO missed the Government Code § 3304 12-month deadline in three (3) matters. This was one reason we worked with SCSO to create the Timeliness Checklist. Hopefully in the future, all SCSO cases will be completed within that 12-month deadline.

IOLERO and SCSO have worked together cooperatively this past year to streamline the investigation and auditing of matters to comply with both state law and industry best practices. We expect this progress to continue in the next fiscal year.

C. Findings

This year, *IOLERO* agreed with SCSO's substantive conclusions in 28 of the 33 audited cases, or 85%. In other words, *IOLERO* concluded that the record supported SCSO's findings that personnel did not violate policy or engage in the alleged conduct. This is a 19-point increase from the 66% identified last year and represents an encouraging development. See 2023-2024 Annual Report at 53. We are hopeful that this trend will continue going forward.

As we also noted last year, *IOLERO* will inform SCSO whether it agrees that SCSO should have used the finding of "exonerated" instead of "unfounded", or vice versa, even though both agreed that the claim should not be sustained against SCSO personnel. *IOLERO* continued to provide its conclusions on this issue this year. Of the 33 audited cases, there were 13 (39%) in which *IOLERO* disagreed with SCSO's findings solely based on whether the claim should be "exonerated" rather than "unfounded", or vice versa. The use of the proper "finding" label, even when all agree there was no sustained misconduct, is important because these terms are defined in Penal Code Sections 832.5, 832.7 and 832.8, and they make material distinctions between whether policy was followed ("exonerated") and whether the alleged conduct occurred ("unfounded"). *IOLERO* will continue to report on this issue going forward. See 2023-2024 Annual Report at 53-54.

VII. Issues / Topical Observations For 2024-2025

A. Evictions

IOLERO audited two cases concerning SCSO's role in the housing eviction process. (See Summary of Audits later in this Report). Housing is a significant concern for the Sonoma County community and evictions place considerable stress on all parties. IOLERO's audits revealed that the rules governing evictions and the limited role played by SCSO in that process can be confusing to the public and a more detailed discussion is appropriate.

Prior to around the 1850s, when a landlord wanted to remove a tenant from a property, they could do so themselves by (for example) entering the property (including breaking in) and physically removing the tenant and/or their personal property and changing the locks, all without going to court.

Not surprisingly, this "self-help" eviction often resulted in violence and breaches of the peace by both parties. To prevent such violence, in the mid-1800s California (along with other States) prohibited "self-help" evictions and required landlords to follow statutory procedures and a court process known as "unlawful detainer". Generally, the statute requires landlords to provide written notices to the tenant and to go to court to obtain an order if the tenant does not leave. The tenant may present their own case in response. The unlawful detainer lawsuit is a "summary proceeding" because it is limited to deciding only who lawfully gets physical possession of the property.

As part of the "unlawful detainer" process, a county sheriff's office is statutorily required to (i) assist in serving court papers and (ii) enforce the court's final order. Enforcing the court's order is what is commonly referred to as the "eviction" – the officer comes to the home with the court order to have the tenant (or landlord) leave. Law enforcement is involved at these stages in order to prevent the type of violence and breach of the peace that resulted during the "self-help" eviction days.

However, the role of a sheriff's office in a landlord-tenant dispute beyond the "unlawful detainer" duties is limited. Law enforcement is not permitted to "take sides" in deciding which party has the lawful right to possession of property—that is a civil decision left to the courts. Indeed, the U.S. Supreme Court has held that law enforcement's assisting one party (landlord or tenant) in denying the other party (landlord or tenant) possession of property before any court order has been issued could violate the 4th Amendment's prohibition against unreasonable property seizure.

While unlawful detainer procedures took control of landlord-tenant disputes, it is still a crime for a person to forcibly enter a property in the lawful possession of another with the intent to deprive them of possession. Thus, if a landlord insisted on using a "self-help" eviction without following the statutory and judicial process—e.g., instead of giving notice and serving papers they just broke into the home, changed the locks, threw out the personal property, shut off the utilities, or blocked access through some other means—they could be charged with this crime.

The crime of forcible entry, however, remains narrow. The "unlawful detainer" process itself creates circumstances in which a landlord could reasonably conclude a tenant has vacated the property in response to a valid written notice (for example, observing the residence was empty of personal property and appeared abandoned), in which case a landlord's entry into the property to change locks (even though a court order has not been issued) would not be a crime.

The rules governing evictions can thus be complicated and confusing to the layperson. This was made more so during the COVID pandemic when many jurisdictions temporarily suspended

evictions. To prevent an end-run of these COVID rules, California officials provided guidance to law enforcement, landlord and tenants to emphasize that California law prohibited “self-help” evictions. Earlier efforts were also made to have law enforcement engage in a limited “mediation” role during landlord-tenant disputes.

However, the role played by a sheriff’s office, including SCSO, in landlord-tenant disputes, remains limited. To avoid becoming entangled in such disputes and risking a 4th Amendment unconstitutional property “seizure” claim, law enforcement (including SCSO) treats landlord-tenant disputes as civil matters unless there is probable cause that a landlord engaged in the narrow type of “self-help” forcible entry that remains a crime today.

IOLERO’s audits noted the disconnect between the layperson’s expectations of law enforcement in a landlord-tenant dispute, and the legal and operational limits that restrict law enforcement’s role in practice. IOLERO recommended that SCSO consider ways to further educate the public on this issue through public-facing media such as its website or through informational releases.

B. Domestic Violence/Elder Abuse

IOLERO audited two matters involving calls for service for alleged domestic violence and for elder abuse. These subjects present heightened safety and emotional concern for officers and parties alike. In the audited cases, IOLERO observed that a rigorous law enforcement response as required by California law may at times be in tension with other important public expectations, leading to a “perceptual” or “expectation” gap with the public.

California law enforcement agencies are required to respond with heightened vigilance to domestic violence and elder abuse calls for service. Among other things, California law places limits on when law enforcement may elect to “cite and release” a suspect at the scene rather than take them to the jail for booking. Domestic violence calls also carry a heightened risk to the safety of officers and the parties. The risk is particularly high where a child is involved and/or a firearm is reported to be present, or a party is not immediately responding to law enforcement communications. These factors may lead law enforcement to initially treat the matter as a potential hostage or barricade situation, requiring even greater diligence. An officer faced with this scenario might have to engage in terse or curt responses until the circumstances have been placed under control.

On the other hand, domestic violence laws and policies recognize the importance of law enforcement responding to the alleged victim’s emotional trauma and needs. Law and policy also recognize the fact that a suspect’s actions may be the result of a mental health crisis. Law enforcement should, when feasible, take this mental health factor into account when engaging with a suspect and assessing whether it is more appropriate for the suspect to be taken for mental health treatment rather than to the jail.

In the two audited matters, IOLERO observed that the legitimate law enforcement responses in each appeared to clash with these other concerns.

The domestic violence call initially presented a potential barricade/hostage scenario involving a child and a reported firearm. SCSO’s deputy was at times terse in his directives in response to this high-risk scenario until it had been resolved. This resulted in the alleged victim subjectively perceiving that the deputy was rude and insensitive. This subjective perception was understandable. However, it was not objectively accurate. IOLERO noted that in such

circumstances there is always an inherent risk that an alleged victim may subjectively perceive deputy demeanor as rude even when the deputy was reasonably and objectively responding to the circumstances. IOLERO further observed that it may not be possible to eliminate this gap entirely given the factual variation in every call for service, but IOLERO recommended that SCSO evaluate whether additional steps could be reasonably included in training to narrow this gap.

The elder abuse call presented a different perceptual issue. A person experiencing a mental health crisis was arrested for elder abuse and taken to jail per California law. While mental health treatment would have been preferable (and mental health assistance was called), the deputy properly complied with California law and policy which required an arrest under the circumstances. The person later accused SCSO of serious misconduct which Body Worn Camera and other records categorically showed did not occur. IOLERO noted that the complainant's subjective characterizations of what occurred was not intentionally false. Rather, it likely reflected their subjective perception of events driven largely by the mental health crisis they were experiencing.

These matters thus presented examples where the operational requirements imposed on law enforcement clashed with other important considerations in addressing the mental and emotional needs of the citizens involved in the events. This can result in a gap between what law enforcement is obligated to do and what may be expected by the citizens involved.

This expectation or perception "gap" is endemic in law enforcement at various levels. While as a practical matter this gap may never be eliminated, narrowing it when feasible (through outreach or education) is an important step to strengthening and reinforcing trust between law enforcement and the public at large.

C. SCSO Comments on Pending Investigations

In one of this year's audits, we concluded that an SCSO spokesperson made inappropriate public comments about a pending IA investigation. Some of the public comments were premature – for example, denying allegations before IA finished investigating them. Other public comments were misleading – for example, offering generic statements that may have been accurate in the abstract, but were inaccurate when applied to the conduct under investigation.

This issue is not unique to a single audit. We noted similar public comments in a case we audited in 2022-2023. There, SCSO posted multiple statements in the days immediately following an incident; some of those statements contradicted BWC footage that was available to SCSO at the time.

In this year's audit, our recommendation to SCSO has been simple: Don't comment on IA investigations.

There are many reasons for this recommendation. Premature comments can influence a witness's memory of the incident. They can inappropriately influence investigators – by coloring their perception of the incident or creating an expectation that the investigation will fit the narrative that SCSO already shared with the public. Where premature statements contain errors, they also damage transparency. Public perception is difficult to correct if the investigation turns out differently

than the initial commentary suggested it would. Even when premature statements don't contain errors, they give the impression that SCSO has already made up its mind before investigating. This can damage community relations and can turn off community members who would otherwise cooperate with an investigation.

Our recommendation does *not* mean that SCSO should withhold information that the public is entitled to receive. Instead, SCSO should be careful about the commentary it attaches to that information. When the IA investigation is still underway, less is better.

D. SCSO Cooperation Trends

Our audits saw increased engagement from SCSO this year.

The IOLERO-SCSO Operational Agreement gives SCSO the opportunity to respond in writing to each of IOLERO's audits within a certain time. This opportunity to respond is an important best practice in oversight. It helps the community better understand what's going on at SCSO, and it helps ensure thoughtful, clear communication between IOLERO and SCSO. It also provides IOLERO with important feedback; if we got something wrong in our audits, we'd like to know and correct it. Sometimes we do based on SCSO responses.

In past years, SCSO has rarely exercised this opportunity. This year, however, SCSO submitted a timely written response to multiple IOLERO audits. Those responses explained SCSO's findings in more detail and provided additional interpretations of SCSO policy. SCSO also performed additional investigation in response to multiple IOLERO audits. Overall, the quality of SCSO's engagement this year caused us to change our preliminary finding in five audits from "incomplete" to "complete." You can find more information about these audits and SCSO's responses in **Section IX** below.

This type of cross-agency engagement improves the oversight process, works toward a greater community trust, and contributes to increased accountability. We acknowledge SCSO's contributions this year, and we hope to see this trend continue.

E. Compliance With SB 1421, SB 16 (Penal Code § 832.7(b))

As noted in prior IOLERO annual reports, California law requires public access to certain law enforcement records. These include incidents where a deputy fires a gun at someone, uses force that causes death or serious injury, or is found to have used unreasonable or excessive force. Records must also be released if a deputy fails to intervene to stop another deputy's excessive force.

The law also makes public any sustained finding that a deputy committed sexual assault involving a member of the public, was dishonest in reporting or investigating crimes or misconduct, engaged in discriminatory conduct based on race, gender, religion, sexual orientation, disability, or other protected status, or carried out an unlawful arrest or search.

IOLERO posts on its website Audits and Investigations that are publicly reportable.

<https://sonomacounty.gov/administrative-support-and-fiscal-services/independent-office-of-law-enforcement-review-and-outreach/audits-and-investigations>.

SCSO also posts public materials on its website. <https://www.sonomasheriff.org/sb1421>.

There were no such cases this year to publicly report, though publicly reportable materials from prior years continue to be available on the IOLERO and SCSO web pages.

VIII. Cases Audited By IOLERO

A. SCSO Administrative Reviews (ARs)

Case Number 20-AR-0009	Administrative Review In-Custody Death
Origin of Review	SCSO (Internally generated)
Race or Ethnicity of Decedent	Unknown
Issues Reviewed	In custody death review. No allegations of misconduct were made. Decedent suffered a fatal cardiac arrest while in custody at the Main Adult Detention Facility (MADF). SCSO conducted an internal review of circumstances surrounding the death to identify possible policy violations and to assess SCSO's overall performance.
SCSO's Conclusion	SCSO found that MADF Staff followed custody policy concerning emergency health care (Policy 709), Safety Checks and rounds (Policies 504 and 513), in-custody death reporting (Policy 511), and information released under Critical Incident Protocol 93-1 (Policies 324, 329). Accordingly, SCSO concluded that there were No Policy Violations Noted in connection with this incident.
IOLERO's Preliminary Conclusion	IOLERO concluded that SCSO's Administrative Review was complete concerning compliance with general law and policy regarding the monitoring of Decedent when he was in the Observation Cell, the emergency medical response by MADF Staff, and post-death notifications and investigation. IOLERO also agreed with SCSO that there was No Policy Violation Noted on these issues. IOLERO also noted that MADF Staff continued to professionally coordinate and conduct Safety Checks of incarcerated persons while life-saving measures were being made for the Decedent. However, IOLERO concluded that SCSO's Administrative Review did not address medical screening of Decedent from Intake through placement into the Observation Cell or identify whether the required post-mortem review was conducted. Accordingly, IOLERO found the Administrative Review incomplete on these issues. IOLERO also noted that SCSO's review was started in 2021 but was not completed until 2024. This delay was not intentional, but it presented difficulties: policies and legal standards had changed since 2020 and findings issued in 2024 may have reduced relevance

	under current law/policies; memories and information fade over time making investigations more difficult. Accordingly, IOLERO was able to evaluate the Administrative Review in general terms only. IOLERO looked to SCSO's policies in place in 2024 which were more detailed and at least as stringent as policy from 2020 concerning medical care and tracking.
IOLERO's Recommendations	None
SCSO's Response	SCSO responded to the Preliminary Audit by supplementing its report to include a review of medical screening from Intake through placement into the Observation Cell and identifying the date on which the post-mortem review was conducted.
IOLERO's Final Conclusion	IOLERO concluded that SCSO's supplementation of its Administrative Review concerning medical screening from Intake through placement into the Observation Cell rendered its review of those issues complete. On the merits, the Decedent was a pre-trial detainee and the 14th Amendment applied an objective standard prohibiting MADF Staff from being "deliberately indifferent" to Decedent's medical needs. IOLERO found that MADF Staff conducted appropriate medical screening and tracking of Decedent and there was no evidence that MADF Staff were aware of Decedent's specific cardiac condition or could have reasonably anticipated the fatal incident. IOLERO therefore concluded that MADF Staff facially complied with the constitutional standard for medical care and agreed with SCSO that there was No Policy Violation Noted on this issue. IOLERO emphasized that this review and conclusion was limited to the issue of access to medical care, and it did not address the adequacy of care or evaluate clinical medical decisions. IOLERO found that SCSO conducted the internal post-mortem review required by Custody Policy 719 within the prescribed 30-day period and agreed with SCSO that there was No Policy Violation Noted on this issue.



B. Investigations Initiated Without a Citizen Complaint (IAs, PPs)

Case Number 24-IA-0002	Use of Force Investigation Use of Force; Policy and Procedure (Medical Care)
Origin of Investigation	SCSO (internally generated)
Race or Ethnicity of Involved Person	Unknown
Allegations Investigated	An SCSO deputy (“Deputy A”) used a “double salivary control hold” on an incarcerated person during the booking process. This is a force technique where a deputy uses their fingers to apply pressure under an individual’s jawline, for the purpose of controlling the individual’s head. SCSO reviewed Deputy A’s use of the control hold; as well as deputies’ overall efforts to de-escalate the incident and obtain a medical evaluation for the individual after using force.
SCSO’s Conclusion	SCSO reviewed BWC / jail footage, reports, jail records, a policy that applies to RNs in the jail, and an SCSO instructor’s written evaluation of the control hold. SCSO also interviewed deputies involved in the incident and the RN who medically cleared the individual for placement in a sobering cell. SCSO found that the control hold was reasonable, necessary, and proportionate because the incarcerated individual was actively resisting during the booking process, policy allows deputies to use control holds to overcome resistance, and Deputy A applied the control hold correctly. SCSO also found that deputies properly de-escalated the incident – because they gave clear directions; and strategically tried to move the individual in a wheelchair instead of using force to carry them or make them walk to their cell. Accordingly, SCSO found that these two issues were exonerated. Lastly, SCSO found that deputies obtained appropriate medical attention for the incarcerated individual, because a sergeant provided an opportunity for medical evaluation after the double salivary control hold; an RN determined that no evaluation was necessary and cleared the individual for cell placement; and two RNs later evaluated the individual. Accordingly, SCSO found that this issue was unfounded.
IOLERO’s Preliminary Conclusion	IOLERO concluded that the investigation was partially incomplete because it didn’t evaluate a different use of force (a “hair pull takedown”) performed by Deputy B earlier in the incident. SCSO may generally determine the scope of an investigation where no one filed a complaint. However, the record evidence raised substantial questions about Deputy B’s force and de-escalation. We determined that no finding could be reached on these issues based on the available evidence. We concluded that the rest of the investigation was complete and timely. IOLERO agreed with SCSO’s finding that Deputy A’s double salivary control hold complied with law and policy. We also agreed that

	deputies <i>other than Deputy B</i> used appropriate de-escalation techniques. As a result, we agreed with SCSO's finding of exonerated on both issues. IOLERO disagreed with SCSO's finding that jail staff obtained appropriate medical attention for the incarcerated individual. SCSO policy says that "all incarcerated inmates shall be seen by jail medical staff for any use of force." We found that a sergeant complied with this policy after the control hold – but that deputies used additional force on the incarcerated individual <i>after</i> that, and no one tried to obtain additional medical evaluation following those later uses of force. As a result, we disagreed with SCSO's finding of unfounded and concluded that this issue should be sustained.
IOLERO's Recommendations	None. However, IOLERO requested that SCSO conduct a supplemental investigation into Deputy B's use of force and de-escalation. We also requested that SCSO forward information to Wellpath (the jail's medical provider) regarding concerning statements the RN made in their interview.
SCSO's Response	SCSO opened a separate investigation into Deputy B's force and de-escalation (although they disagreed with our conclusion that the IA investigation should have addressed those issues). They also forwarded IOLERO's concerns to Wellpath. However, SCSO disagreed with IOLERO's analysis of the medical attention issue and amended their finding (originally UNFOUNDED) to exonerated .
IOLERO's Final Conclusion	IOLERO concluded that the original SCSO investigation became complete once SCSO opened a separate investigation regarding Deputy B and will separately audit the Deputy B investigation once it's finished. IOLERO reaffirmed its conclusion that the medical attention issue should be sustained . Although the SCSO Response provided more analysis of this issue, we found that the analysis didn't apply the relevant policy section and didn't address the relevant facts.

Case Number 23-PP-0005	Internal Complaint Conflict of Interest; Policy and Procedure
Origin of Complaint	Internal Affairs and later to IOLERO
Race or Ethnicity of Complainant	Unknown
Allegations in the Complaint	Complainant was a former employee of SCSO, who complained to Internal Affairs that another employee had claimed they were actively working to ensure the County took negative personnel action against the Complainant, and that this action was motivated by bias. After separating from SCSO, Complainant later complained to IOLERO that their complaint was not adequately investigated by Internal Affairs in that a specific witness was allegedly not interviewed. The Complainant also alleged that the assigned Internal Affairs investigator was a close friend of the employee about whom

	they complained, such that that investigator had a conflict of interest and should not have been assigned the matter.
SCSO's Conclusion	SCSO interviewed the complainant and multiple witnesses involved in the case, as well as a variety of SCSO records regarding the original complaint but made no effort to investigate the complaint that the matter had not been investigated properly. For these reasons, SCSO found that multiple witnesses contradicted the complainant's claims about a specific employee trying to arrange negative personnel action against the complainant. Therefore, the complainant's allegations in this regard were Unfounded.
IOLERO's Preliminary Conclusion	IOLERO concluded that this investigation was complete as to all the original allegations made by the Complainant and agreed with SCSO's conclusion. However, IOLERO concluded that the investigation into the complainant's claim that the Internal Affairs investigation had a conflict of interest was incomplete. IOLERO observed that the witness the complainant claimed had not been interviewed by Internal Affairs was, in fact, interviewed in the original case. But the allegations about the conflict of interest on the part of the investigator were not.
IOLERO's Recommendations	None
SCSO's Response	SCSO responded that no investigation was necessary into the second complaint regarding an incomplete and conflicted Internal Affairs Investigation because that original investigation had been adequately reviewed by command staff in the first instance.
IOLERO's Final Conclusion	IOLERO considered SCSO's response but reaffirmed its preliminary conclusions.



C. Citizen Complaints

1. MADF

Discourtesy, Dishonesty, Conduct Unbecoming

Case Number 23-C-0088	Citizen Complaint No. 1 Discourtesy; Neglect of Duty; Dishonesty
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Unknown
Allegations in the Complaint	Complainant alleged that when MADF Staff cancelled visitation they neglected their duty, were discourteous, and violated Complainant's and other visiting persons' and inmates' civil rights.
SCSO's Conclusion	SCSO found that MADF Staff cancelled visitation due to an elevator becoming inoperative. Because escorting visitors via the stairwell presented safety and liability hazards, cancellation of visitation for that day was appropriate and permitted under these circumstances by state regulations. Visitors were understandably disappointed, but there was no evidence of discourtesy or breach of duty by any MADF Staff, and SCSO concluded the finding should be Not Sustained .
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation was complete . On the merits, IOLERO agreed with SCSO that the evidence showed no misconduct by MADF Staff. An inoperative elevator met the standard of "a legitimate operational or safety and security concern" under which state regulations permit visitation cancellation. 15 C.C.R. 1062(b). Based on Complainant's allegations, the visitors were informed as a group that visitation was cancelled and no one person was singled out. There was also no allegation of any improper tone or language used by MADF Staff. While SCSO made a finding of Not Sustained , IOLERO concluded that the record showed that the finding on the "discourtesy" and "dishonesty" allegations should be unfounded , and the finding on "neglect of duty" should be exonerated .
IOLERO's Recommendations	None
SCSO's Response	None

Case Number 24-C-0006	Citizen Complaint No. 2 PREA; Policy and Procedure
Origin of Complaint	SCSO
Race or Ethnicity of Complainant	Unknown
Allegations in the Complaint	Complainant alleged that MADF Staff had sexual intercourse with an incarcerated person in the facility, stole inmate medication, and brought illegal drugs into the facility.
SCSO's Conclusion	SCSO found no evidence that any Staff had sexual intercourse with any incarcerated person, and no evidence that any MADF Staff brought drugs into the facility or distributed drugs or inmate medication. Accordingly, SCSO concluded the finding on both allegations was unfounded .
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation was complete and further noted that SCSO's investigation was extensive in scope and content. On the merits, IOLERO agreed that the evidence showed that no MADF Staff had sexual intercourse with any incarcerated person, and no MADF Staff intercepted inmate medications or brought drugs/medications into the facility and distributed them. IOLERO therefore agreed with SCSO that both claims were factually unfounded.
IOLERO's Recommendations	Video surveillance cameras are installed in many, but not all, modules at the MADF. In this case, they were not installed in the module where the Complainant alleged the events occurred. SCSO noted this and recommended that ongoing efforts to install cameras in all housing modules continue. IOLERO made the same recommendation to SCSO in 2023 and joined SCSO's recommendation in this case as well. We further noted that surveillance cameras materially assisted in resolving multiple claims previously audited by IOLERO and would assist in investigating future claims.
SCSO's Response	None



Case Number 23-C-0032	Citizen Complaint No. 3 Discourtesy
Origin of Complaint	SCSO
Race or Ethnicity of Complainant	Unknown
Allegations in the Complaint	Complainant alleged that an MADF deputy referred to him with a racially offensive term and denied him access to the grievance process.
SCSO's Conclusion	SCSO found that Complainant first called the deputy the racial term. The deputy only repeated the word when he sought to confirm what Complainant had called him. Although the deputy did not repeat the word with racial or ill intent, and he did not direct the term at Complainant or anyone else, SCSO concluded that its policy prohibited use of the term by Staff under any circumstance and imposed strict liability for doing so. SCSO therefore sustained the claim and imposed administrative discipline. SCSO also found the deputy did not intentionally deny Complainant access to the grievance process and concluded the claim was not sustained .
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation was complete. On the merits, IOLERO agreed with SCSO's sustained finding. SCSO's imposition of strict liability for use of the racial term was consistent with the terms of SCSO Policy 320 and the administrative discipline imposed by SCSO was consistent with the nature of the violation. SCSO's strict prohibition on use of the offensive term reflected the universal understanding that the racial term has no legitimate purpose in any setting. IOLERO also agreed with SCSO that the deputy did not improperly delay or deny Complainant access to the grievance process. Grievance policy provided a reasonable time (generally not more than 14 days) after the incident for Complainant to file a grievance and he was able to do so the same day. IOLERO concluded that the finding on this claim should be exonerated rather than not sustained as found by SCSO.
IOLERO's Recommendations	None
SCSO's Response	None

Case Number 22-C-0020	Citizen Complaint No. 4 Discourtesy; Policy and Procedure
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Unknown
Allegations in the Complaint	Complainant alleged that an MADF deputy referred to a group of inmates with a profane word, interfered in the grievance process, and violated COVID procedures.
SCSO's Conclusion	The deputy acknowledged using the profane term in frustration when a group of inmates called out insults from their cells. SCSO concluded that the profanity nevertheless violated SCSO's Policy 320, sustained the complaint, and imposed administrative discipline. SCSO also found that the deputy sought to informally resolve the grievance and did not seek to deny or delay the grievance process, and the deputy did not take any actions that violated COVID policy. Therefore, SCSO concluded the finding on both claims to be unfounded .
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation was complete. On the merits, IOLERO agreed with SCSO's sustained finding. The evidence showed that the deputy used profanity in frustration when Complainant and other inmates insulted Staff from their cells. The deputy's profanity was one of the more socially prevalent words and is often (arguably too often) used in modern social culture and media. However, the word still retained an inflammatory effect particularly in a correctional setting. Use of the word by an inmate against Staff would be grounds for discipline and it is appropriate for the same result to apply when Staff used the word against inmates. The administrative discipline imposed by SCSO was proportional and consistent with the nature of the violation. IOLERO also agreed with SCSO that the deputy did not deny access to the grievance process or violate COVID policy. The deputy tried to informally resolve the grievance as required by policy, there was no evidence of intent to delay, and Complainant had full access to the grievance process. The deputy also did not handle medical materials or play a substantive role in COVID testing. Accordingly, IOLERO concluded the findings should be unfounded (as to intentionally denying access to grievances procedures) and exonerated (as to compliance with COVID protocols).
IOLERO's Recommendations	None
SCSO's Response	None

Conditions of Confinement

Case Number 21-C-0004	Citizen Complaint No. 5 Policy and Procedure
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Unknown
Allegations in the Complaint	Complainant alleged that various aspects of the conditions of confinement at the MADF were inadequate, including out-of-cell time, handling of inmate pro per (self-representation) status, ADA compliance, medical care and other matters.
SCSO's Conclusion	SCSO found that Complainant in fact had received state-mandated out-of-cell time, ADA accommodation, and medical care and that the claims on these issues were factually unfounded . SCSO also found that the evidence was not sufficient to resolve the claim concerning the handling of Complainant's pro per status and other issues raised by Complainant and the finding was inconclusive . (The correct term should be "Not Sustained" which in this context means "Inconclusive").
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation was complete. On the merits, IOLERO agreed that the evidence showed that Complainant in fact received required out-of-cell time and the findings should be unfounded (as to factual allegations) and exonerated (as to compliance with law/policy). IOLERO further concluded that the findings should be exonerated (pro per claim, medical care) and unfounded (ADA claim). Because it was not feasible to investigate the remaining claims due to Complainant's unavailability, IOLERO concluded that the findings on the remaining claims should be not sustained.
IOLERO's Recommendations	None
SCSO's Response	None

Breach of Duty

Case Number 21-C-0008	Citizen Complaint No. 6 Policy and Procedure; Neglect of Duty; Conduct Unbecoming
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	White
Allegations in the Complaint	Complainant alleged that MADF Staff were negligent in their duty to protect him from other inmates, one of whom assaulted Complainant.
SCSO's Conclusion	SCSO found no evidence that MADF Staff were "deliberately indifferent" to Complainant's safety (in reference to the constitutional standard) but made no specific finding on this issue. SCSO separately found compliance with policy concerning out of cell activity management and Body Worn Camera use and made an exonerated finding on these issues. SCSO found the evidence was insufficient to determine whether two deputies did or did not comply with Detention Policy concerning inmate management and Office-Wide personal conduct Policy and made not sustained findings for these issues.
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation was complete. On the merits, IOLERO agreed that the evidence did not show MADF Staff were "deliberately indifferent" to Complainant's safety under the federal Constitutional standard. This standard differs depending on whether a person is serving a sentence after conviction (where the narrower "subjective" 8th Amendment applies) or is a pre-trial detainee (broader "objective" 14th Amendment standard applies). The 8th Amendment standard applied in this case and the evidence showed MADF Staff did not breach it. While SCSO did not make a formal finding, IOLERO concluded that the finding should be exonerated. However, because the MADF houses persons who are subjected separately to either the 8th Amendment and 14th Amendment (respectively), IOLERO evaluated the matter under the 14th Amendment standard for illustrative purposes only. IOLERO concluded that a similar finding of "exonerated" would be appropriate under the broader 14th Amendment standard for one deputy, but that factual issues prevented a finding regarding another deputy under the broader 14th Amendment standard that could result in a "not sustained" conclusion had that standard applied in this specific case. IOLERO also agreed that the record showed MADF Staff complied with out-of-cell activity policy and Body Worn Camera Policy and that the finding should be exonerated.

	Finally, IOLERO agreed with SCSO that the evidence was insufficient to determine whether two deputies did or did not comply with MADF Inmate Management policy and, by extension, whether they did or did not violate personal conduct Policy 320, resulting in a finding of not sustained. This was due primarily to the lack of clear interpretational history of the Inmate Management policy by SCSO at an institutional level. IOLERO further noted that the SCSO investigation took extra steps to review the consistency of statements provided by parties which, in turn, strengthened the substance of the investigative findings.
IOLERO's Recommendations	IOLERO recommended that in all failure-to-protect "deliberate indifference" claims, SCSO include an analysis of whether, and to what extent, the inmate management principles apply and how specifically they interact with Staff's overall duty to ensure inmate safety under both the 8 th Amendment and 14 th Amendment standards.
SCSO's Response	None

Case Number 22-C-0007	Citizen Complaint No. 7 Policy and Procedure; Neglect of Duty (Medical Care)
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Hispanic/Latine(x)
Allegations in the Complaint	Complainant alleged that he received inadequate medical care in the MADF and that Staff broke a "promise" to provide him with a medical brace.
SCSO's Conclusion	SCSO found that Complainant received significant medical care at the MADF, there was no evidence that any Staff were "deliberately indifferent" to Complainant's medical needs, and SCSO made a finding of unfounded on these issues. SCSO also found that although there was no record showing Complainant was "promised" a medical brace, it was possible that verbal statements could have been made but it was not feasible to further clarify that issue and the finding should therefore be not sustained .
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation was complete. On the merits, IOLERO agreed that the evidence showed Complainant received significant medical care at the MADF and there was no evidence that any Staff was "deliberately indifferent" to his medical needs. (Complainant was a pre-trial detainee and the

	broader 14th Amendment standard applied). However, IOLERO concluded the appropriate finding should be exonerated instead of unfounded. IOLERO also agreed that it was not possible to determine whether a “promise” had actually been made to provide a medical brace as Complainant alleged and that the finding should be not sustained.
IOLERO’s Recommendations	None
SCSO’s Response	None

Case Number 24-C-0005	Citizen Complaint No. 8 Policy and Procedure; Use of Force
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Hispanic/Latine(x)
Allegations in the Complaint	Complainant was previously incarcerated in the jail. Complainant alleged that a deputy smashed their hand in a cell door food port; and that the jail made paperwork errors causing complainant to be incarcerated for 2 extra months.
SCSO’s Conclusion	For the hand injury, SCSO reviewed medical and other records. For the incarceration period, SCSO reviewed records and analysis provided by specialized jail staff familiar with SCSO’s jail time calculation procedures. SCSO found that the deputy began closing complainant’s food port because complainant was throwing things through it; that complainant put their hand in the food port to stop the deputy from closing it; and that complainant’s hand had only “minimal skin abrasions” afterward. SCSO found that it was reasonable for the deputy to close the food port based on complainant’s behavior and exonerated the deputy as a result. SCSO noted that they were unable to clarify why complainant believed they were over-incarcerated but found that the jail accurately calculated complainant’s release date. Accordingly, SCSO found that this claim was unfounded.
IOLERO’s Preliminary Conclusion	IOLERO agreed with SCSO’s finding that the deputy didn’t use excessive force when complainant was injured, but for different reasons. Specifically, credible evidence showed that complainant’s injury was a true accident – the deputy didn’t intend to cause any physical contact to the complainant. As a result, the deputy didn’t use force, and we agreed with SCSO’s finding of exonerated. IOLERO disagreed with SCSO’s finding that the jail accurately calculated complainant’s release date, because this part of the

	investigation was incomplete . Specifically, IOLERO could not determine from SCSO's report how they applied policy/evidence to reach their finding. There also wasn't enough evidence in the record for IOLERO to reach its own finding; as a result, IOLERO reached no finding on this claim.
IOLERO's Recommendations	None
SCSO's Response	SCSO provided a supplemental memorandum that analyzed complainant's release date in detail, produced additional relevant evidence, and reached the same finding of unfounded on this claim.
IOLERO's Final Conclusion	Based on SCSO's response, IOLERO found that SCSO's investigation was now complete . However, IOLERO disagreed with SCSO's finding of unfounded , because SCSO's response showed that the jail actually did miscalculate complainant's release date. That miscalculation was small – only 4 days (not 2 months), and it didn't extend complainant's incarceration. Still, we reached a finding of sustained on this claim because the jail did miscalculate complainant's release date.

Use of Force

Case Number 21-C-0007	Citizen Complaint No. 9 Use of Force
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Unknown
Allegations in the Complaint	Complainant alleged that MADF Staff used unnecessary force to remove him from his cell.
SCSO's Conclusion	SCSO found no evidence that MADF Staff engaged in any of the physical actions alleged by Complainant during the cell extraction and that the use of force otherwise complied with law and Policy. Therefore, SCSO concluded the finding should be exonerated as to all officers.
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation was complete . On the merits, IOLERO agreed that Complainant's factual characterizations of the officers' actions did not accurately reflect what occurred and that those factual characterizations were unfounded . IOLERO also found that the force actually used consisted of holding Complainant's arms and legs to the ground while restraints were applied, and use of a wrist lock with minimal pressure. These actions constitute minimal force, they were proportional to the level of resistance and need to restrain Complainant (who refused to voluntarily leave his cell), and were applied only after de-escalation

	efforts were made through negotiation. Accordingly, IOLERO agreed that the finding should be exonerated .
IOLERO's Recommendations	None
SCSO's Response	None

Case Number 23-C-0051	Citizen Complaint No. 10 Use of Force; Dishonesty
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	White
Allegations in the Complaint	Complainant alleged that MADF Staff harassed him and used unnecessary force to remove him from his cell.
SCSO's Conclusion	SCSO found that MADF Staff had valid grounds to believe Complainant possessed a dangerous metal item requiring a search of his person and cell. When Complainant refused to exit his cell, use of oleo capsicum ("OC" or pepper spray), non-lethal projectiles and pain compliance techniques was reasonable and complied with Use of Force law and policy. Therefore, MADF Staff should be exonerated . SCSO also found that shutting off water to the cell before the cell extraction was a legitimate safety protocol, but SCSO did not make a specific finding on this issue.
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation was complete. On the merits, IOLERO agreed that there was significant evidence that Complainant possessed a metal object that could be used as a weapon or to fashion a weapon, that it posed an immediate risk to the safety of the facility, Staff and other inmates, that Staff had legitimate grounds to compel Complainant to leave his cell for a search, and shutting off the cell water prior to cell removal was an accepted safety tactic. Thus, Complainant's allegation that MADF Staff shut off the water in order to "violate" his rights, and his claim that Staff had no right to search him, were unfounded. IOLERO also agreed that the force used complied with law and policy. In response to Complainant's insistence that he would not voluntarily exit the cell and that he would physically resist anyone entering, Staff started with a "negotiation" team to persuade Complainant and when that failed moved to a low-level use of OC gas. When that failed Staff assembled an extraction team, used a

	concussive flash charge and non-lethal rounds to distract Complainant (who shielded himself with a pillow), and entered the cell only as a last resort. In the cell deputies used limited “jab strikes” with a blunted baton when Complainant hid his hands and when Complainant stopped resisting MADF Staff immediately re-set to a compliance mode and all force was terminated. Staff’s response and use of force was objectively reasonable and proportional at all stages and was used after feasible de-escalation efforts were exhausted. Accordingly, the record supported a finding of exonerated. IOLERO specifically noted that the cell extraction team operated professionally and was able to adapt back to a compliance scenario and to terminate all force immediately after Complainant stopped resisting.
IOLERO’s Recommendations	None
SCSO’s Response	None

Prison Rape Elimination Act (PREA)

Case Number 23-C-0036	Citizen Complaint No. 11 PREA
Origin of Complaint	SCSO
Race or Ethnicity of Complainant	Unknown
Allegations in the Complaint	Complainant alleged that a correctional deputy violated law and policy by conducting a visual Safety Check on him while he showered.
SCSO’s Conclusion	SCSO performed a multi-level PREA investigation and found that the deputy properly conducted a visual Safety Check required by law and policy and in compliance with PREA. SCSO also concluded that the Safety Check was a routine interaction which did not require activation of the deputy’s BWC. Accordingly, SCSO made a finding of exonerated on each issue.
IOLERO’s Conclusion	IOLERO concluded that SCSO’s investigation was complete. On the merits, IOLERO agreed that the evidence showed the deputy conducted a brief visual Safety Check as required by law and policy and in accordance with PREA. The evidence also showed the deputy

	complied with Body Worn Camera policy. Accordingly, IOLERO agreed that the finding on these issues should be exonerated .
IOLERO's Recommendations	None
SCSO's Response	None

Case Number 23-C-0075	Citizen Complaint No. 12 PREA; Policy and Procedure (Medical Care)
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Native American
Allegations in the Complaint	Complainant alleged that MADF Staff violated law and policy by inquiring about gender identification and by failing to provide medical care.
SCSO's Conclusion	SCSO conducted a PREA investigation and found that inquiries concerning gender identification are required by federal and state law and SCSO Policy, there was no evidence of ill-intent or harassment, and the finding on this issue should be exonerated . SCSO further found that Complainant in fact received medical care during their incarceration and concluded the factual claim to the contrary was unfounded .
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation was complete . On the merits, IOLERO agreed that federal and state law and SCSO Policy require inquiries about gender identification during booking to ensure the person's safety and to assign Staff of appropriate gender to conduct searches. The evidence did not show any improper or harassing conduct. The evidence also showed Complainant requested, and received, medical care for a claimed ailment. Accordingly, IOLERO concluded that the findings on these issues should be exonerated (as to compliance with law and policy on gender inquiries and access to medical care), and unfounded (with respect to the factual claim that no medical care was provided at all).
IOLERO's Recommendations	None
SCSO's Response	None

Case Number 23-C-0061	Citizen Complaint No. 13 PREA
Origin of Complaint	SCSO
Race or Ethnicity of Complainant	Unknown
Allegations in the Complaint	Complainant alleged that a correctional deputy violated PREA by making an inappropriate sexual and biological comment to another incarcerated person which she perceived to be about her.
SCSO's Conclusion	SCSO found that a comment made by a deputy in connection with feminine hygiene was not sexually suggestive or derogatory and concluded that the claim of a PREA violation and/or sexual harassment was unfounded .
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation of the PREA and sexual harassment claim was complete. On the merits, IOLERO disagreed with SCSO and instead concluded that the deputy's comment – either as alleged by Complainant or as acknowledged by the deputy – could be reasonably viewed as referencing sexual conduct or feminine hygiene and therefore triggered a PREA and sexual harassment review. However, IOLERO agreed with SCSO that because the comment was a single incident and there was no evidence the deputy made any other comments of a similar nature on any other occasion in the MADF, and no other Staff heard the comment, there was no PREA violation (which required repeated statements) or violation of sexual harassment policy. IOLERO noted, however, that SCSO did not address the broader question of whether such a comment (or similar comments with sexual or gender hygiene overtones) was ever appropriate within the MADF generally or within the mental health module specifically. IOLERO reviewed this question and concluded that there was no legitimate reason for such comments to ever be made by SCSO Staff. While the record showed the deputy made the comment without ill intent and was likely only making a passing comment in response to an unsolicited comment made by another inmate, IOLERO observed that such comments exposed SCSO to potential liability for 8th or 14th Amendment violations of sexual harassment of inmates, and statutory sexual harassment (including hostile environment) of Staff. IOLERO further observed that such allegations should be subject to rigorous investigative scrutiny, and when appropriate referred to the County's EEO department for review.

IOLERO's Recommendations	IOLERO recommended that SCSO adopt a per se, strict liability policy that any comments with a sexual tone or content (including references to gender hygiene) are prohibited within the MADF for all Staff. SCSO adopted a per se, strict liability prohibition on the use of a racial term as described in Audit 23-C-0032 set forth above.
SCSO's Response	None

Case Number 23-C-0056	Citizen Complaint No. 14 PREA
Origin of Complaint	SCSO
Race or Ethnicity of Complainant	Unknown
Allegations in the Complaint	Complainant alleged that they were sexually assaulted by a correctional deputy during booking at the Main Adult Detention Facility.
SCSO's Conclusion	SCSO conducted a PREA investigation and concluded that the allegation was unfounded .
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation of the PREA claim was complete . On the merits, IOLERO agreed with SCSO that the allegation was factually unfounded . In the PREA investigative interview the Complainant admitted that the allegation was made as a joke, and there was no other evidence independently suggesting that any assaultive conduct occurred.
IOLERO's Recommendations	None
SCSO's Response	None

2. Patrol

Breach of Duty – Evictions

Case Number 23-C-0069	Citizen Complaint No. 15 Policy and Procedure; Bias
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Unknown

Allegations in the Complaint	Complainant claimed that SCSO officers violated their duty when they did not investigate an alleged housing lockout as a criminal matter, and that officers were allegedly biased in favor of the landlord.
SCSO's Conclusion	SCSO found that its officers properly identified the claimed housing lockout as a civil matter that was part of ongoing court eviction proceedings, and concluded the finding on this allegation should be exonerated . SCSO also found no evidence that any SCSO officer provided favorable treatment to the landlord and concluded this claim was unfounded .
IOLERO's Preliminary Conclusion	IOLERO concluded that SCSO's investigation on the merits was complete. On the merits, IOLERO agreed that because there was an ongoing court proceeding and Complainant had removed most of their property from the residence as part of that proceeding, the officers properly concluded that the claim of an alleged lockout was a civil rather than a criminal matter. Constitutional law limits law enforcement from taking sides in a tenancy dispute before a civil court has issued its ruling. California law and SCSO's Policy similarly limit SCSO officers to serving process and executing court-signed eviction orders. If a landlord forcibly locks out a tenant from a residence without using the court process, they may be subject to criminal penalties, but that is a narrow exception, and it was not the scenario presented in this case. Accordingly, IOLERO agreed that the finding should be exonerated. IOLERO also agreed that there was no evidence of favoritism by any SCSO officer towards the landlord based on their inclusion in any group and that the finding should be unfounded. Separately, IOLERO found that some officers did not activate their Body Worn Cameras when speaking with Complainant while other officers did. SCSO Policy was inconsistent as to when the BWC should be activated under these conditions. Because SCSO did not evaluate this, IOLERO concluded the investigation on this specific issue was incomplete.
IOLERO's Recommendations	IOLERO noted there is a clear difference between how the public views law enforcement's role in landlord-tenant disputes, and what law enforcement is legally allowed to do under law and policy. This difference likely contributed to Complainants' belief that this matter should have been handled in a criminal fashion. IOLERO recommended that SCSO collaborate with community groups and determine whether public information such as websites or handouts might narrow this gap.

	A more detailed discussion of issues associated with law enforcement involvement in landlord-tenant disputes is included in the body of this Annual Report.
SCSO's Response	SCSO responded to the Preliminary Audit by noting (1) its investigation focused on the merits and did not intend to address the BWC issue (2) IOLERO should raise collateral policy issues in the audit without labeling the investigation "incomplete" and (3) clarified when officers are required to activate the BWC: interviews at the main office and telephonic interviews are not required to be BWC-recorded; BWCs need not be activated if an officer encounters no one when arriving on scene. SCSO requested that the "incomplete" finding be removed.
IOLERO's Final Conclusion	IOLERO replied by noting that generally an SCSO investigation is considered "Complete" when it compiles sufficient evidence to evaluate the substantive issues under review. However, when facts identified in an investigation indicate a separate possible violation of law or policy, SCSO should review that issue. Compliance with BWC Policy is one of the issues which both IOLERO and SCSO have previously identified as a matter of sufficient importance that it should be investigated when facts suggest a possible violation even if it is not part of the initial allegations. IOLERO found that some officers activated the BWC and others did not, and that SCSO needed to clarify more specifically when the BWC should be activated. SCSO provided its clarification and IOLERO issued a Modified Final Audit concluding that the investigation on this issue was complete and, based on SCSO's interpretation of its policy, concluding the finding as to all officers under the BWC policy to be exonerated .

Case Number 23-C-0074	Citizen Complaint No. 16 Policy and Procedure
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Native American
Allegations in the Complaint	Complainant alleged that SCSO mailed them an invalid set of documents as part of an eviction proceeding, in violation of their civil rights.
SCSO's Conclusion	SCSO found that it had been asked to serve court-issued eviction papers but had been unable to do so due to insufficient information. Accordingly, SCSO returned the documents to the court. SCSO does not mail papers to any persons unless service of those papers had first been made by posting at the residence. SCSO files showed it

	did not mail any documents to Complainant. Accordingly, SCSO concluded the factual claim that SCSO mailed invalid documents as part of the eviction was unfounded .
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation was complete . On the merits, IOLERO agreed that there was no evidence SCSO mailed eviction documents to Complainant. Accordingly, IOLERO agreed that the finding should be unfounded .
IOLERO's Recommendations	None
SCSO's Response	None

Breach of Duty – Calls for Service Generally

Case Number 23-C-0053	Citizen Complaint No. 17 Bias; Neglect of Duty; Discourtesy
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	White
Allegations in the Complaint	The deputy responded to a 911 call reporting an attack on the complainant and conducted a follow-up investigation of the attack. Complainant alleged that the deputy's investigation was insufficient; that this was the result of prejudice (complainant's sexual orientation); and that the deputy was discourteous.
SCSO's Conclusion	SCSO interviewed the complainant and deputy; reviewed footage; and reviewed dispatch records, reports, emails, and news articles. SCSO found that the deputy's follow-up investigation wasn't reasonable, because they didn't try to find or contact witnesses; didn't do enough to identify the suspect; didn't consider certain crimes that the evidence suggested; and didn't consider getting detectives involved. Accordingly, SCSO found that this claim was sustained . However, SCSO found no evidence of discrimination, and found that the deputy wasn't discourteous (one alleged statement didn't occur, another didn't violate policy). Accordingly, SCSO found that these claims were unfounded .
IOLERO's Conclusion	IOLERO agreed with SCSO's finding that the deputy didn't conduct a reasonable investigation, for the reasons that SCSO identified and others. IOLERO also agreed with SCSO's finding that the deputy was not discourteous, for the reasons that SCSO identified. As a result, we agreed with SCSO's respective findings of sustained and unfounded . We also found that these parts of the investigation were complete .

	IOLERO found that SCSO's investigation of the discrimination claim was incomplete, because the investigation didn't consider evidence that challenged the deputy's credibility; and didn't question the deputy's experience, training, or policy knowledge. IOLERO concluded that no finding could be reached on the discrimination claim because SCSO had not developed enough evidence; and therefore disagreed with SCSO's finding of unfounded. IOLERO found that SCSO's investigation was also incomplete because it didn't address evidence of possible supervisor misconduct related to the deputy's investigation. IOLERO concluded that no finding could be reached on this issue, because SCSO had not developed enough evidence.
IOLERO's Recommendations	IOLERO recommended additional training for the deputy; and recommended that SCSO avoid commenting unnecessarily on pending IA investigations, because of the potential to influence the investigation and mislead the public.
SCSO's Response	None



Case Number 23-C-0080	Citizen Complaint No. 18 Conduct Unbecoming; Neglect of Duty; Discourtesy
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Declined to State
Allegations in the Complaint	Complainant alleged that a deputy was rude, disrespectful and biased when responding to a call for service involving a civil standby during a court-ordered child custody exchange, and that the deputy was negligent in carrying out their duty.
SCSO's Conclusion	SCSO found no evidence that the deputy was rude, discourteous or biased against Complainant, and concluded that the deputy complied with law and policy in carrying out the civil keep-the-peace function. Accordingly, SCSO concluded the finding should be unfounded .
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation was complete. On the merits, IOLERO agreed that the record showed the deputy acted professionally and did not engage in any conduct that could objectively be characterized as rude, discourteous or biased. Accordingly, IOLERO agreed that the finding should be unfounded. IOLERO also agreed that the evidence showed the deputy complied with law and policy in conducting the keep-the-peace function during the custody exchange. The keep-the-peace function is limited to ensuring parties remain peaceful during contentious civil interactions. Deputies are to remain neutral when performing such functions and should intercede only if they observe, or to prevent, criminal conduct or violence. The record showed the deputy complied with these rules. However, IOLERO concluded the finding should be exonerated rather than unfounded as determined by SCSO.
IOLERO's Recommendations	IOLERO noted that this matter represented the intersection of (i) law enforcement's limited function on a "keep-the-peace" call and (ii) separate obligations imposed by the Child Abuse and Neglect Reporting Act (CANRA), Penal Code §§ 11164 et seq. which requires law enforcement (and other mandated reporters) to report suspected child abuse when they have a factual basis. In this case, the Complainant refused to allow the child to go with the other parent and sought to have the deputy serve the other parent with papers in which Complainant would be seeking to change the court-ordered custody schedule. Complainant alleged generally that the other parent had abused the child but provided no specific facts. Acting in a limited "keep-the-peace" call, the deputy interviewed the child privately and exercised discretion by not requiring the child to go with the other parent and referring all parties to take the matter to court.

	Deputies conducting a “keep-the-peace” function involving child custody and abuse allegations are thus presented with parallel policy and legal mandates that, while not necessarily inconsistent with each other, exhibit tension in circumstances such as this case. This is a complicated issue for which IOLERO did not identify specific guidance. Given the importance of child abuse prevention, IOLERO recommended that SCSO, as the agency with the requisite experience and expertise, review this issue and determine whether policy clarification is feasible and/or appropriate. A more detailed discussion of this issue is included in the body of this Annual Report.
SCSO’s Response	None

Case Number 24-C-0001	Citizen Complaint No. 19 Constitutional Rights (Patrol)
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Declined to State
Allegations in the Complaint	A deputy towed complainant’s car for lack of registration. Complainant alleged that this violated the constitution and the deputy’s oath of office because the California Vehicle Code is only a “code,” and not a “law” requiring registration.
SCSO’s Conclusion	SCSO spoke to the complainant twice; researched a term the complainant used when explaining the complaint; reviewed footage of the incident; and reviewed citation and tow records. SCSO concluded that the deputy acted within the law and policy and reached a finding of exonerated. Specifically, SCSO found that the deputy had probable cause to stop complainant for multiple Vehicle Code violations; that law and policy allowed the deputy to cite the complainant and tow their car for those violations; and that SCSO members were professional when interacting with the complainant on scene.
IOLERO’s Conclusion	IOLERO concluded that SCSO’s investigation was complete. IOLERO agreed with SCSO’s finding that the traffic stop, citation, and tow/storage complied with the Vehicle Code, SCSO’s policy, the Constitution’s requirement of probable cause, and the deputy’s oath of office; and that this claim should therefore be exonerated. Specifically, IOLERO found that video footage confirmed complainant’s Vehicle Code violations, and that the Vehicle Code allowed the deputy’s actions; noted that complainant didn’t dispute the lack of registration; and dismissed complainant’s argument that the Vehicle Code is not a law.

IOLERO's Recommendations	None
SCSO's Response	None

Case Number 24-C-0004	Citizen Complaint No. 20 Discourtesy; Conduct Unbecoming
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Declined to State
Allegations in the Complaint	Complainant alleged that a deputy acted with inappropriate sensitivity when responding to a domestic violence call for service.
SCSO's Conclusion	SCSO found that the deputy properly investigated the call for service and concluded the finding should be exonerated on this issue. SCSO also found no evidence that the deputy was rude or discourteous to the Complainant and concluded the finding on this issue was unfounded .
IOLERO's Preliminary Conclusion	IOLERO concluded that the investigation into the deputy's mannerisms and level of sensitivity in responding to the call for service was complete. However, IOLERO found that SCSO did not evaluate whether the deputy's failure to provide Complainant written domestic violence information was consistent with SCSO policy and that review of this issue was incomplete. On the merits, IOLERO agreed that the evidence showed the deputy was within his discretion when determining that there was not probable cause to make an arrest. Probable cause is a fluid concept and an officer in the deputy's position could reasonably conclude that the facts adduced in the call for service did not meet the requirement. IOLERO also agreed with SCSO that the evidence did not show the deputy engaging in rude or discourteous conduct. Domestic violence calls present a much higher risk of harm to officers and the parties than do other service calls, and this matter also involved the reported presence of a weapon and a child requiring officers to initially treat the scene as a potential barricade/hostage situation. The deputy and other officers were in a high-stress environment and the deputy may have been curt in some of his statements, but these statements did not objectively rise to the level of discourtesy or rudeness. Accordingly, IOLERO concluded the finding should be exonerated on both claims.
IOLERO's Recommendations	IOLERO noted that this case illustrated the collision of (i) law enforcement duties to ensure safety during high-risk domestic violence calls and (ii) the need to show sensitivity to persons

	potentially impacted by domestic violence. While the deputy's curtness was a legitimate response to the unique needs of the situation, the Complainant could understandably subjectively view such conduct as "rudeness". IOLERO noted that it might be impossible to eliminate entirely the risk of such subjective perceptions given the uniqueness of facts and varying needs of each incident. Nevertheless, IOLERO recommended that SCSO identify this issue for its officers as part of its ongoing domestic violence training. IOLERO also recommended that SCSO review its domestic violence policies 310 and 318 to assess their interplay as to the information and assistance required to be provided to alleged victims of domestic violence. A more detailed discussion of this issue is included in the body of this Annual Report.
SCSO's Response	In response to the Preliminary Audit, SCSO stated that the investigation was focused on the deputy's actions as alleged by Complainant and that it was beyond the scope of the investigation to address whether the deputy provided Complainant with written domestic violence materials. Accordingly, SCSO objected to IOLERO's finding of "Incomplete" on that issue. SCSO went on to clarify that it interpreted the term "should" in the domestic violence policy to mean "strongly recommend" but that it was not mandatory.
IOLERO's Final Conclusion	IOLERO replied to SCSO, acknowledging that an investigation of a citizen complaint is generally limited to the core allegations and does not entail a generalized or open-ended performance review of an officer. However, in this case the claim was that the deputy was rude or insensitive to Complainant as an alleged domestic violence victim, and the question of complying with domestic violence policy was plainly presented and lay at the core of the matter. IOLERO's Preliminary Audit noted that SCSO Policy specified that a deputy "should" provide domestic violence materials to an alleged victim even where no arrest had been made. In this case, SCSO domestic violence policy used the term "should" and "shall" interchangeably between different parts of the policy and it was not clear whether SCSO applied the term "should" in a permissive, semi-permissive or mandatory manner. Based on the plain language of the Policy and the underlying goals it sought to achieve by distributing written materials to alleged victims, IOLERO noted that IOLERO would have interpreted the term "should" to be mandatory absent a good reason to the contrary as articulated by the deputy. However, IOLERO noted that SCSO is both entitled and required to provide its own interpretation of its policy. SCSO did so by clarifying that it interpreted the term to mean "strongly recommended" but that it was not mandatory in the context of the domestic violence policy.

	IOLERO reviewed SCSO's interpretation and concluded that even though IOLERO may have had a different reading, SCSO's interpretation was a reasonable reading of its Policy. Based on SCSO's interpretation, IOLERO concluded the investigation of this issue was complete and that the finding should be exonerated .
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Case Number 24-C-0007	Citizen Complaint No. 21 Discourtesy; Policy and Procedure; Neglect of Duty; Bias
Origin of Complaint	SCSO
Race or Ethnicity of Complainant	Unknown
Allegations in the Complaint	Complainant alleged that an SCSO deputy breached her duty by not investigating their claim as a case of criminal assault/battery and not providing Complainant a written report, and that the deputy was rude, discourteous and biased.
SCSO's Conclusion	SCSO found that the deputy properly investigated Complainant's allegations and concluded there was not probable cause of an assault or battery, and that the deputy was not required to provide Complainant a written report. SCSO also found no evidence that the deputy was rude, discourteous or biased. SCSO accordingly concluded the claims were Unfounded .
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation was Complete. On the merits, IOLERO Agreed that the evidence showed the deputy performed her duties to investigate the allegations and in documenting the investigation in SCSO records. The record also supported the deputy's conclusion that there was not probable cause that a criminal assault/battery occurred. The deputy also complied with SCSO policy which did not permit issuance of a written report where there was not probable cause except in specific circumstances that were not applicable in this case. Accordingly, with respect to the alleged breach of duty IOLERO concluded that the deputy complied with policy and that finding should be Exonerated rather than factually Unfounded as determined by SCSO. IOLERO also Agreed that there was no evidence that the deputy was rude, discourteous or biased and that the finding should be factually Unfounded. With respect to whether the deputy's demeanor complied with SCSO policy, IOLERO separately concluded that it did and that the finding should be Exonerated.

IOLERO's Recommendations	None
SCSO's Response	None

Case Number 23-C-0087	Citizen Complaint No. 22 Use of Force; Sexual Assault
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Unknown
Allegations in the Complaint	Complainant alleged that SCSO patrol and correctional deputies used excessive force, sexual assault and engaged in other illegal acts when she was incarcerated following an arrest for domestic violence and elder abuse.
SCSO's Conclusion	SCSO found that the evidence affirmatively showed Complainant was never sexually assaulted or abused, drugged, or shocked with a Taser as alleged and concluded these factual allegations were unfounded . SCSO also found no evidence of any excessive force used on Complainant either during the arrest or at the MADF. SCSO concluded the finding on Use of Force as to the arresting officers should be exonerated and that the Use of Force finding as to MADF Staff should be unfounded .
IOLERO's Conclusion	IOLERO concluded that SCSO's investigation was complete. On the merits, IOLERO agreed with SCSO that the claims lacked merit, but IOLERO rearranged the analysis to provide greater clarity. First, IOLERO found that the Complainant's factual characterizations of what occurred were not accurate and did not reflect what actually occurred as revealed by Body Worn Camera video and other records. There was no doubt that Complainant's characterization of events was based on how she subjectively perceived them. Nevertheless, those characterizations were objectively incorrect. The record showed Complainant was never sexually assaulted or abused or otherwise physically treated in the various ways which she alleged. Accordingly, IOLERO concluded these factual characterizations were unfounded. Second, IOLERO found that the force actually used by SCSO members was minimal and complied with law and policy. The only force used during the arrest was pulling Complainant from the patrol vehicle (after she had crawled through the partition into the front seat after slipping the handcuffs) and holding Complainant to the ground

	while restraints were re-applied. This force complied with law and policy, including de-escalation and proportionality requirements. The force used at the MADF consisted of holding Complainant to the ground while restraints were removed, a wrist lock, and a salivary or “hypoglossal” hold (pressure point under the jawline) to control head movement and for compliance. The record showed this force was minimal, was proportional to the need, followed de-escalation efforts, and was terminated as soon as compliance was achieved. Accordingly, IOLERO agreed with SCSO that use of force complied with constitutional and policy requirements and that the finding as to all SCSO officers should be exonerated. IOLERO also noted that this matter involved the difficult intersection of state requirements to enforce domestic and elder abuse laws through arrest with the separate goal of law enforcement responding to mental crises with alternative referrals for mental health treatment where feasible. SCSO officers properly concluded that an arrest for domestic or elder violence was mandated by state law and policy. However, Complainant was experiencing a mental health issue and it was apparent that this, along with the use of additional restraints when Complainant twice slipped handcuffs and then entered the front seat of the patrol vehicle, were significant factors behind Complainant’s subjective (but objectively erroneous) characterization of events.
IOLERO’s Recommendations	None
SCSO’s Response	None

Case Number 23-C-0065	Citizen Complaint No. 23 Policy and Procedure
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Declined to State
Allegations in the Complaint	Complainant claimed that a specific SCSO Deputy was driving at night with their headlights off in violation of the Vehicle Code.
SCSO’s Conclusion	SCSO interviewed the Complainant, but not the Deputy. SCSO claimed that the complainant stated they only saw the vehicle parked, not in motion, which is not a Vehicle Code violation. SCSO thus closed the case as unfounded.
IOLERO’s Conclusion	IOLERO noted that the SCSO recorded interview of the complainant showed the complainant said the opposite, specifically, that the lights of the vehicle were off <i>while</i> the vehicle was in

	motion. IOLERO therefore found the investigation was incomplete because the complainant had, in fact, articulated a Vehicle Code violation and named the deputy, triggering the need for an interview of the deputy. IOLERO concluded it could reach no finding on this incomplete record.
IOLERO's Recommendations	None
SCSO's Response	None



Case Number 23-C-0062	Citizen Complaint No. 24 Bias; Constitutional Rights (Patrol); Policy and Procedure
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Unknown
Allegations in the Complaint	Complainant filed a complaint with IOLERO in which he claimed he had been searched on the street by an SCSO Deputy in retaliation for having made disparaging remarks about SCSO Deputies while previously being incarcerated at the MADF, the Sonoma County Jail. He also complained that he was booked into custody at the MADF after this search, and that he was treated inappropriately during that booking process.
SCSO's Conclusion	SCSO investigated the case by analyzing documentary evidence and Body Worn Camera (BWC) footage, but did not interview any of the participants. SCSO concluded that the complainant was on probation at the time of the search, such that the SCSO Deputy had authority to search him. Moreover, there was no evidence to suggest that searching deputy knew anything about the complainant's comments about other deputies in the MADF. Body Worn Camera (BWC) footage showed the deputy was polite and acted within policy during the search. SCSO further found that the complainant had drugs in his possession during that search, making his arrest proper. But SCSO did not investigate whether the complainant was treated appropriately during his booking. The allegation of an improper search was therefore exonerated.
IOLERO's Conclusion	IOLERO concluded that the investigation into the search and arrest of the complainant was complete and agreed with the finding of exonerated. IOLERO concluded the investigation into the allegation of retaliation was also complete but disagreed with the finding of unfounded and recommended instead exonerated. But IOLERO found the investigation into the claim of improper treatment during booking was incomplete.
IOLERO's Recommendations	None
SCSO's Response	None

Case Number 23-C-0058	Citizen Complaint No. 25 Policy and Procedure; Use of Force; Discourtesy; Neglect of Duty; Dishonesty
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Hispanic/Latine(x)
Allegations in the Complaint	Complainant claimed that SCSO Deputies conducted a search of their home without a warrant, that the Deputies were discourteous because they threatened Complainant with arrest if they did not control their dog during the search, and that that threat of arrest was an improper Use of Force.
SCSO's Conclusion	SCSO interviewed the Complainant, reviewed body-worn camera footage and documents generated by SCSO during the case and spoke to Adult Probation about whether the Complainant was subject to a search of their home as a condition of probation at the time of the search. SCSO found that the deputies in this case properly conducted a probation search, such that they were not required to have a warrant. Adult Probation confirmed the deputies' claim that a person living at the address was on probation at the time, and that one term of that probation was a waiver of the probationer's 4th Amendment protections in the home. SCSO therefore exonerated the deputies on the search allegation. The Complainant alleged the probationer was not at the address at the time because they were incarcerated. SCSO noted that probation search clauses remain in effect even while the probationer is re-incarcerated. SCSO further found that the deputies did threaten to make an arrest if the Complainant did not control the dog. However, SCSO concluded that a threat to make an arrest is not a Use of Force. Therefore, SCSO unfounded the Use of Force allegation because no force was used. Finally, SCSO concluded that the Complainant accurately described the statements made by the deputies at the scene, but that these statements met SCSO policy regarding courtesy. Thus, SCSO found the discourtesy allegation exonerated.
IOLERO's Conclusion	IOLERO found the investigation was incomplete as to a body worn camera violation. Specifically, the body worn camera footage reviewed by the investigator showed that one deputy intentionally deactivated their camera near the end of the search but while still in contact with the Complainant at the residence, which is a violation of the SCSO body worn camera policy. Furthermore, that deputy then interviewed the Complainant at the scene without recording that interview with the body worn camera. Despite these violations being apparent from the materials reviewed by the investigator, no action was taken on these violations.

	IOLERO found the remainder of the investigation was complete as to the allegations raised by the Complainant. IOLERO agreed with SCSO's findings that the Use of Force allegation should be unfounded and that the search allegation should be exonerated . IOLERO disagreed that the allegation of discourtesy should be unfounded , but instead should be exonerated , because the alleged statements were, in fact, made, but were courteous.
IOLERO's Recommendations	None
SCSO's Response	None

Case Number 23-C-0052	Citizen Complaint No. 26 Conduct Unbecoming; Bias; Policy and Procedure; Neglect of Duty; Dishonesty
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	Declined to State
Allegations in the Complaint	Complainant claimed SCSO deputies refused to take a report on her claim that she had been pushed by a bartender and suffered injuries, refused to document her injuries or interview witnesses, lied about the events, and did so out of racial bias.
SCSO's Conclusion	SCSO interviewed the complainant, but did not record the interview. SCSO also reviewed Body Worn Camera (BWC) of the incident, a report drafted by the responding deputy, dispatch logs, and other records. SCSO concluded that the responding deputy did properly use BWC to record their work, interviewed parties and the scene, and wrote a report, but that the evidence gathered at the scene clearly refuted all of the complainant's claims. SCSO therefore reached an unfounded finding on all allegations in the case.
IOLERO's Conclusion	IOLERO noted that the SCSO failure to record the interview of the complainant was not a violation of policy, but that SCSO would be well advised to record all complainant interviews in the future. IOLERO concluded that the investigation was otherwise complete . IOLERO concluded that four of the five allegations should have been exonerated instead of unfounded and thus disagreed with the findings in this case on that sole issue.
IOLERO's Recommendations	None
SCSO's Response	None

Case Number 21-C-0020	Citizen Complaint No. 27 Discourtesy; Neglect Of Duty
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	White
Allegations in the Complaint	Complainants called SCSO seeking assistance with re-entering a rental property they had occupied for some time but had recently left. They alleged that they did not receive prompt and appropriate assistance initially, such that they had to re-enter the property on their own. There, they discovered the property had been burglarized, so called SCSO again for assistance. When finally assisted by a Deputy, they claimed the Deputy was discourteous. In sum, their complaint was that all of these inadequacies in the service received were omitted from the reports generated by SCSO about the incident such that they were false.
SCSO's Conclusion	SCSO conducted no interviews in this case. Instead, the investigator reviewed body-worn camera footage and documents generated by SCSO during the responses to the Complainants' calls for service and compared those against the final report in the incident to check for accuracy and veracity. The investigator also confirmed from this evidence that the responding deputy had gone to the scene of the burglary call, properly concluded that there was not probable cause to believe a burglary had occurred, and helped the Complainants secure the property and remove a trespasser. SCSO found that the deputy in this case properly documented the events shown in Body Worn Camera and other resources, and that the actions taken matched SCSO policy. In particular, the report properly characterized statements taken at the scene, and that the actions taken to secure the property for the Complainants was appropriate. Therefore, SCSO found the responding deputy should be exonerated .
IOLERO's Conclusion	IOLERO found the investigation was complete and agreed with SCSO's finding that the deputy should be exonerated .
IOLERO's Recommendations	None
SCSO's Response	None

Case Number 23-C-0063	Citizen Complaint No. 28 Conduct Unbecoming; Bias; Use of Force; Discourtesy; Neglect Of Duty; Dishonesty
Origin of Complaint	IOLERO
Race or Ethnicity of Complainant	White
Allegations in the Complaint	Complainant had called SCSO when she found a friend who had overdosed from drugs and was unresponsive. SCSO responded, but her friend died.

	Complainant had several complaints about how SCSO handled the matter once they responded, including too slow of a response from 911 when she called, neglect of duty for not providing adequate care on arrival and with regards to handling the body once her friend was found to be deceased, bias in the manner in which the case was handled, excessive force, and dishonesty.
SCSO's Conclusion	SCSO interviewed the complainant and a deputy involved in the case, reviewed Body Worn Camera (BWC) footage, and gathered reports from the incident. Those materials showed that SCSO deputies arrived promptly after the complainant made her initial call to 911, and that medical personnel arrived two minutes later than the deputies. They also found that Narcan and other appropriate interventions were attempted, but that the complainant's friend was already deceased. SCSO also found that the body was treated in accordance with policy once the decedent expired. SCSO also found there was no excessive force used, and that deputies and other personnel were honest about what occurred at the scene. Because they could find no violations of policy in these regards, they found no evidence of any bias, either. For these reasons, SCSO found all of the complainant's allegations were unfounded. However, SCSO did determine that one responding deputy did not have Narcan in his patrol vehicle as required by policy. SCSO did not interview this deputy as to why his vehicle lacked Narcan on arrival. Narcan was still administered by others at the scene.
IOLERO's Conclusion	IOLERO concluded that this investigation was complete as to all the allegations made by the Complainant, and generally agreed with SCSO's conclusions on those allegations. That said, IOLERO did find that the allegations regarding the medical aid given and the way the deputies spoke to the complainant should be exonerated not unfounded, because the alleged conduct did occur, it was just consistent with policy and training. But as to the allegation discovered by SCSO that one deputy did not have Narcan in their patrol vehicle as required, IOLERO concluded the investigation was incomplete because the deputy was not interviewed as to why they did not have Narcan in their vehicle. While this is an important policy to enforce, understanding why the failure occurred is key in selecting the appropriate corrective action. Moreover, the deputy had a due process right to explain their side of the story before a charge was sustained against him.
IOLERO's Recommendations	None
SCSO's Response	None

D. Civil Claims

Case Number 19-C-0028	Civil Claim No. 1 Use Of Force; Constitutional Rights (Patrol)
Origin of Complaint	Civil Claim
Race or Ethnicity of Complainant	Unknown
Allegations in the Complaint	Complainant alleged that an SCSO deputy arrested him without investigating first; and threw him onto the ground without provocation.
SCSO's Conclusion	SCSO reviewed BWC footage, the deputy's report, a use of force report, and medical booking records. SCSO interviewed some individuals who witnessed the incident, but not the deputy. SCSO concluded that the deputy used a reasonable amount of force, and that the force was consistent with SCSO policy and the law. SCSO also concluded that the arrest complied with SCSO policy and the law. As a result, SCSO found that both allegations were exonerated.
IOLERO's Conclusion	IOLERO concluded that this investigation was complete. IOLERO noted that this was a unique case because it predated the Completeness Checklist; if that Checklist applied to this case, the investigation probably would have been Incomplete because SCSO didn't interview the deputy. IOLERO agreed with SCSO's findings of exonerated on both allegations. Force: Complainant physically resisted when the deputy tried to handcuff him (pulling away, moving his arms, and raising himself off the ground). It was objectively reasonable for the deputy to use force (a takedown and a control hold) briefly to overcome that resistance. Arrest: The reporting party wanted complainant arrested for trespassing. The deputy investigated (speaking to complainant and multiple others) and had probable cause to arrest complainant. Even so, the deputy spent about 20 minutes trying to get the complainant to leave voluntarily. The deputy only arrested complainant when complainant insisted that the deputy do it.
IOLERO's Recommendations	None
SCSO's Response	None

Case Number 23-C-0055	Civil Claim No. 2 Use Of Force; Constitutional Rights (Patrol); Bias
Origin of Complaint	Civil Claim
Race or Ethnicity of Complainant	Unknown
Allegations in the Complaint	Complainant filed a civil claim claiming SCSO deputies improperly searched her home, a violation of her civil rights. She also claimed that during that search the deputies broke her front gate, damaged dry wall in her home, killed her dog, broke her finger, dislocated her

	shoulder, injured her head and arm, and caused her other economic damages.
SCSO's Conclusion	SCSO attempted to interview the complainant but was only able to get the complainant to respond to questions over email. SCSO also reviewed Body Worn Camera (BWC) of the incident, a report drafted by the responding deputy, dispatch logs, medical records, and other records. SCSO did not interview the two deputies who used force in this case. SCSO concluded that the search of the home was proper, but did not explain why. The allegation of an improper search was therefore exonerated. SCSO concluded the property damage and personal injuries claimed did not occur, and thus those allegations were unfounded. SCSO examined the use of force of only one deputy in this case and found that use of force was proper. This allegation of excessive use of force was therefore exonerated. The other deputy's use of force was not analyzed.
IOLERO's Preliminary Conclusion	IOLERO concluded that the investigation into the personal injuries and property damage was complete and agreed with the findings. But IOLERO found the investigation into the uses of force were incomplete because one lacked an interview of the deputy, and because the other use of force was not analyzed at all. Nonetheless, IOLERO noted these uses of force may have been appropriate on the limited information available. As for the search of the home, IOLERO concluded the lack of analysis and fact gathering as to why the search was proper made the investigation Incomplete, but that a thorough investigation and analysis might find the search was proper such that the deputies could be exonerated.
IOLERO's Recommendations	None
SCSO's Response	IOLERO's initial audit noted that a Use of Force report and a segment of Body Worn Camera were missing from the materials SCSO originally provided to IOLERO. SCSO replied to the initial audit by promptly providing those materials.
IOLERO'S Final Conclusion	IOLERO acknowledged the additional evidence, but didn't revise its analysis / findings.

IX. Matters Investigated by IOLERO

A. In-Custody Deaths

Case Number 24-INVEST-0001	Independent Investigation Related IOLERO Case: 24-INVEST-0002 Related SCSO Cases: 23-AR-0003 23-IA-0003 24-PP-0003
Origin of Investigation	IOLERO conducted an independent investigative review of an in-custody death that occurred at the Main Adult Detention Facility (MADF). SCSO conducted its own separate Administrative Review and IA investigation.
Race or Ethnicity of Decedent	Unknown
Issue Under Review	Decedent died as a result of a suicide attempt while incarcerated in the MADF. IOLERO independently reviewed evidence and records provided by SCSO to evaluate SCSO's institutional performance in connection with this incident. SCSO was fully cooperative with IOLERO's review. IOLERO conducted a separate review concerning actions of specific SCSO personnel which are the subject of IOLERO's separate report in 24-INVEST-0002. (See below).
IOLERO's Findings and Recommendations	Finding No. 1 There is a need for redundancy in suicide information reporting. Pre-Booking, Booking and post-Booking mental health screening was generally conducted and documented by MADF Staff. However, suicide prevention is a "linear" process which can be interrupted or even broken by a single instance of an informational gap. Recommendation: SCSO should create redundancy by require all MADF Staff to forward relevant information to Mental Health Staff (even if the information is duplicative and regardless of the Staff's specific role) to lessen the potential for downstream impacts flowing from a single-point error. Finding No. 2

There is a need for enhancement and clarification of check protocol.

Law and policy require periodic safety checks of all detainees that (i) is direct view (e.g., the officer physically sees the detainee with their own eyes), and (ii) is sufficient to determine the need for medical or mental health intervention. Detainees identified with mental health issues have a higher risk of suicide. “Walk-by” safety checks (in which Staff peer into a cell while walking by without stopping) do not, in IOLERO’s analysis, constitute face-to-face safety checks and are otherwise substantively insufficient to assess the need for medical or mental health intervention.

Recommendation No. 1: SCSO should revise or clarify Policy to expressly reflect that safety checks of persons identified with mental health issues must be conducted by stopping at the cell door and physically scanning the interior of the cell to assess the detainee’s presentation, cell conditions and signs of possible or planned self-harm. Walk-by safety checks in this context should be prohibited.

Recommendation No. 2: SCSO should revise or clarify Policy to expressly reflect that face-to-face safety checks of detainees identified with mental health issues are (i) priority tasks that take precedent over other duties absent compelling reasons or exigent circumstances and (ii) are not excused by the intervention of other administrative duties.

Recommendation No. 3a: SCSO should require MADF Staff to document in writing for each round (to be retained at the cell door) real-time visual observations from safety checks of persons identified with mental health issues, with observations at least as detained those used for Safety Cells, Sobering Cells and Observation Cells.

Recommendation No. 3b: SCSO should clarify Policy to provide that activation of the internal electronic rounds tracking system constitutes a “certification” by the Staff that the round will be conducted in accordance with Policy, subject to administrative enforcement under SCSO Policy § 320.5.7, or § 320.5.8 if violation was intentional.

Recommendation No. 4: SCSO should conduct refresher training for all MADF Staff concerning the revised/clarified safety check policy and at least yearly thereafter.

Recommendation No. 5: Following clarification of safety check requirements and notice to Staff, SCSO should strengthen disciplinary penalties for Staff shown to have violated safety check policy more than once, or where the

	specific violation was intentional or otherwise reflective of a conscious disregard of safety, policy or law. Finding No. 3 Facility rounds should be sample-audited periodically under government auditing standards using video files to assess compliance with safety check requirements. Recommendation No. 1: Same as Recommendation 3a under Finding No. 2, above. Recommendation No. 2: Implement periodic (e.g., quarterly or bi-annual) institutional auditing and review of randomly selected samples of rounds conducted on detainees identified with mental health issues to evaluate compliance. Corrective actions for non-compliance could include enhanced/refresher training and/or referral to internal affairs for follow up in individual cases. Finding No. 4 Criminal review of deaths at the MADF have heightened risk of conflict of interest requiring increased vigilance in the criminal review process. Recommendation: Under Critical Incident Protocol 93-1 to which SCSO and other law enforcement agencies in Sonoma County are signatories, in-custody deaths occurring at the MADF are criminally investigated by SCSO's Patrol Division rather than being referred to another law enforcement agency. An agency tasked with investigating itself raises the potential for a conflict of interest. However, no conflict was identified in this matter. SCSO's Patrol Division and Detention Division are administratively separate and referral to an outside law enforcement agency is available if SCSO identifies a potential conflict of interest. Nevertheless, IOLERO recommended that SCSO review procedures to ensure Patrol Division criminal reviews of in-custody deaths at the MADF are neutral in all respects, do not involve actual, likely or an appearance of conflict of interest, and are based solely on objective assessments.
SCSO's Response	None

Case Number 24-INVEST-0002	Independent Investigation Related IOLERO Case: 24-INVEST-0001 Related SCSO Cases: 23-AR-0003 23-IA-0003 24-PP-0003
Origin of Investigation	IOLERO conducted an independent investigative review of an in-custody death that occurred at the Main Adult Detention Facility (MADF). SCSO conducted its own separate Administrative Review and IA investigation. SCSO was fully cooperative with IOLERO's review.
Race or Ethnicity of Decedent	Unknown
Issue Under Review	Decedent died as a result of a suicide attempt while incarcerated in the MADF. IOLERO independently reviewed evidence and records provided by SCSO to evaluate the actions of specific SCSO personnel in connection with this incident. IOLERO conducted a separate review concerning SCSO's institutional performance which is the subject of IOLERO's separate report in 24-INVEST-0001. (See above).
IOLERO's Findings and Recommendations	Finding No. 1 Suicide Prevention Reporting As a general matter SCSO Staff collected and documented mental health and suicide risk information, and Mental Health Staff conducted clinical evaluations, during Decedent's incarceration. However, one Correctional Staff failed to document and report information relevant to suicide prevention. IOLERO therefore concluded that the Staff member violated policy and Agreed with SCSO's Sustained finding. IOLERO also concluded that SCSO institutionally bore significant responsibility for this breach and that the level of discipline imposed by SCSO reflected this mitigating consideration. IOLERO also found two other Staff members had information that was relevant to suicide prevention, but SCSO policy did not expressly require those Staff members to report the information. IOLERO concluded that while redundancy is not always appropriate, in the case of suicide prevention redundancy in information reporting is important to prevent a single-point error from undermining the linear suicide prevention process. IOLERO Recommended to SCSO that it

	revise/clarify its Policy to include this redundancy in suicide information reporting. Finding No. 2 Two deputies conducted Safety Checks which were entirely “non-observational” meaning they did not visually look into the cells. IOLERO concluded that this violated law and policy and agreed with SCSO’s sustained finding on each. IOLERO also concluded that the deputies’ violation was likely the result of what they perceived to be SCSO’s guidance and institutional practice and was not the result of an intentional disregard of Policy. Therefore, the level of discipline imposed by SCSO was appropriate under these considerations. IOLERO also concluded that SCSO interpreted its policy as allowing “walk-by” Safety Checks of detainees identified with mental health issues. Based on SCSO’s interpretation of its own Policy, IOLERO agreed with SCSO that the deputies should be exonerated when they conducted “walk-by” Safety Checks. Personnel cannot be administratively disciplined when they comply with the institution’s expectations. However, IOLERO further concluded that “walk-by” Safety Checks of persons identified with mental health issues did not meet the requirements of governing law. Using “walk-by” Safety Checks for such individuals also increases the risk of a detainee engaging in undetected self-harm and exposes SCSO to potential civil liability. IOLERO recommended that SCSO modify/clarify its policy to expressly require direct observation of detainees identified with mental health issues during a Safety Check; that Staff record their observations on a log similar to what is done for Safety Cells, Sobering Cells and Observation Cells; expressly prohibit “walk-by” Safety Checks for detainees identified with mental health issues; increase disciplinary sanctions for violating Safety Check policy.
SCSO’s Response	None



Case Number	Independent Investigation
24-INVEST-0003	Related SCSO Case: 23-AR-0002
Origin of Case	IOLERO conducted an independent investigative review of an in-custody death that occurred at the Main Adult Detention Facility (MADF). SCSO conducted its own separate Administrative Review. SCSO was fully cooperative with IOLERO's review.
Race or Ethnicity of Complainant	Unknown
Issue Under Review	Decedent suffered a stroke while incarcerated at the MADF and later died at a hospital. Although Decedent was technically not in custody at the time of death, the incident leading to death occurred in the MADF and both SCSO and IOLERO reviewed the matter as an "in-custody" death. IOLERO independently reviewed evidence and records provided by SCSO to evaluate SCSO's institutional performance.
IOLERO's Findings and Recommendations	Finding No. 1 Medical screening was conducted and documented as required by law and policy. MADF Staff identified Decedent's medical issues, properly required outside medical clearance before admitting Decedent into the MADF, documented the medical condition internally, arranged for full medical review by a doctor, and conducted timely Safety Checks. Finding No. 2 Booking, classification and housing was conducted as required by law and policy. MADF Staff properly managed Decedent during Booking, Sobering Cell placement, and Classification. Housing was assigned in accordance with Classification findings and Safety Checks were timely conducted. Finding No. 3 Emergency and post-emergency actions proceeded as required by law. MADF Staff promptly responded to Decedent's emergency request for medical care, Medical Staff appropriately assumed authority over medical decisions, and MADF Staff cooperated fully in implementing medical decisions.

	FINDING NO. 4 There was <i>prima facie</i> compliance with constitutional standards of access to medical care. IOLERO evaluated <i>access</i> to medical care. The record showed <i>prima facie</i> compliance by MADF Staff with constitutional requirements. For pre-trial detainees, the 14th Amendment prohibits Staff from being “deliberately indifferent” to the serious medical needs of a detainee under an “objective” standard that is akin to “reckless disregard” of a medical issue. MADF Staff’s decisions concerning conditions of confinement, on their face, acknowledged and took account of Decedent’s medical condition and took steps to abate the risk associated with it. IOLERO did not evaluate the <i>adequacy or substance</i> of the clinical medical decisions made by medical staff.
SCSO’s Response	None

X. IOLERO Compliance with Auditing Standards

A. Auditing Standards

As detailed in our last annual report, IOLERO has been working towards adopting the same auditing standards as similar agencies, commonly known as the Yellow Book, or GAGAS standards. We continue to strive to implement those guidelines here.

One Yellow Book standard is to have an audit plan describing what we audit and how. (GAGAS chapter 8.83.) In other agencies, that audit plan might be different from audit to audit depending on the topics the agency chooses to audit in a given year. Here at IOLERO, we have a very specific set of issues that Measure P directs us to audit, and little resourcing to audit anything more. Plus, in each case we audit, the approach of our auditors is the same: apply the Completeness and Timeliness checklists and determine if we agree or disagree with each finding. For that reason, we’ve decided to treat Measure P as our audit plan. That way, the SCSO, the public, and our auditors all know what we’ve set out to audit and how, as required by the Yellow Book.

Another Yellow Book requirement is a certification attesting to how we complied (or didn’t) with those standards. That certification is below.

B. Yellow Book (GAGAS) Certification

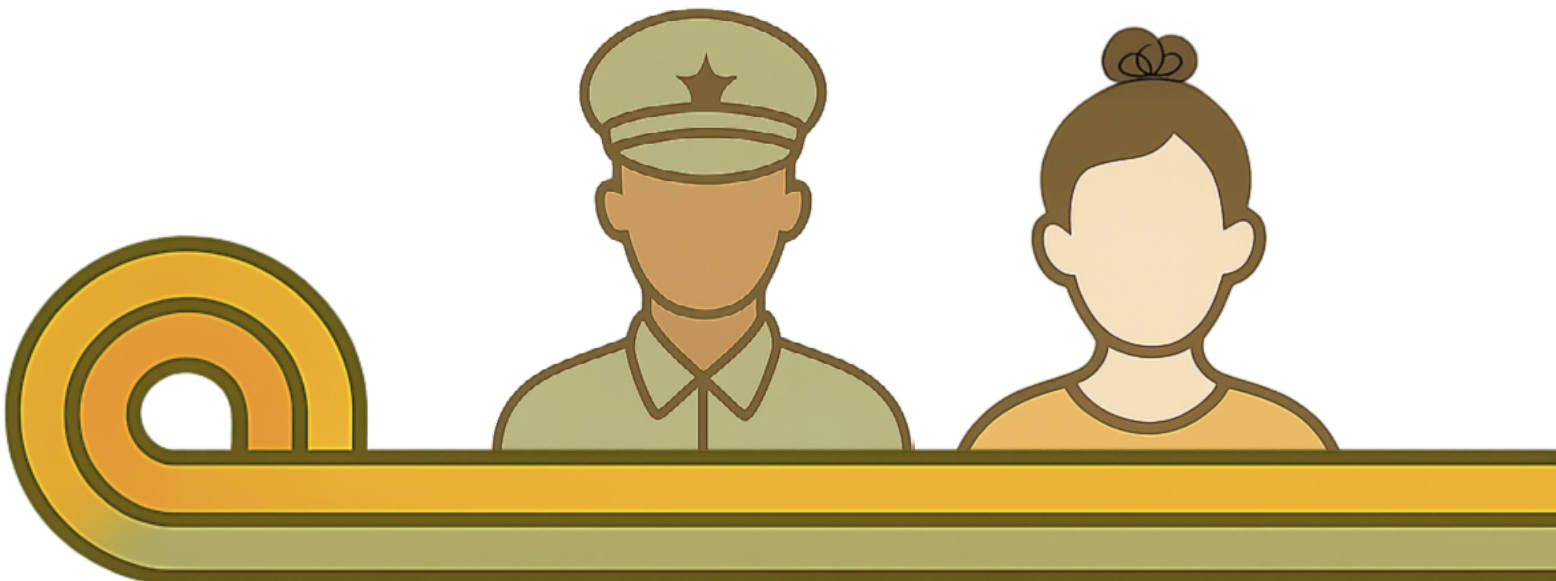
We completed the work described in this annual report in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. In addition, IOLERO conducts these audits independently, such that the work reported here reflects our independent conclusions.

XI. Conclusion

This year we moved further into the work of Measure P than ever before. We completed independent investigations for the first time. We created more transparency about deaths in the jail. And we supported the CAC to complete a raft of policy projects. Cooperation and collaboration with the Sheriff's Office was strong both with IOLERO and the CAC. Sheriff's Office investigations into allegations of misconduct was more often complete, and more often timely, than before.

On the other hand, we started encountering barriers to our work. Some of our subpoenas are still in court, and interviews with Sheriff's Deputies did not yield substantive cooperation or increased transparency. We're looking forward to next year when we hope to have more clarity from the courts about our subpoena power, and therefore more clarity about our access to information.

Also, short staffing put us behind on our audit work this past year. But know our increased audit and investigations staff this coming year will be able to move through far more audits and investigations this next year.



Appendices

Appendix A: CAC Member Biographies

First District

Robin Jurs

Robin has lived in Sonoma County since her retirement from a 40-year career in Early Childhood Development in 2016. Over the years, her work with young children brought her into contact with hundreds of families. It is this investment in family as one of the pillars of our social fabric that makes her want to make law enforcement more accountable to the community it serves. She cannot imagine being a mother who worries every time her daughter or son walks out of the house if they will return alive or not. The death of George Floyd pushed her over the edge at which point she knew she had to take steps herself to work toward better policing policy and practice in her own community and throughout this country. Robin lives in Oakmont, District 1, where she founded a club called Standing for Justice and is active in the Oakmont Democratic Alliance. Her interests take her outside the boundaries of Oakmont and into the Sonoma County community. She feels fortunate to live somewhere where the citizens' voices can make a difference.

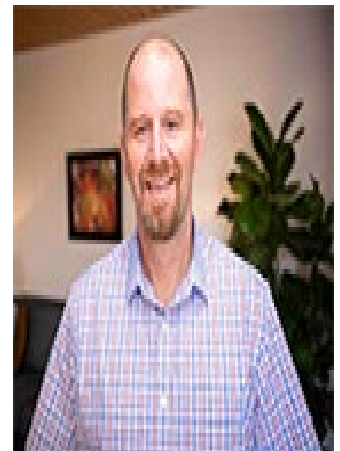


Robin is the 5th of 6 children in her family, grew up in the East Bay and has stayed in and around the Bay Area most of her life. She hopes to learn from her tenure on the CAC of IOLERO as well as to make any contributions she may be able to make.

Nathan Solomon

Mr. Solomon holds a Bachelor of Arts in Psychology and a Master of Science in Computer Information Systems. In college he was first introduced to the psychology of policing when taking coursework from Craig Haney who conducted the Stanford Prison experiments. He currently works as a Senior Information Security Analyst for Jackson Family Wines. Nathan has over 25 years of experience in IT working various roles including founding his own software company.

Nathan is a native of Sonoma County and has lived in Santa Rosa for the past 14 years. He has a 17-year-old son and wife of twenty-one years who was raised in Santa Rosa. Nathan's interest in serving on the Community Advisory Council for IOLERO stems from the Andy Lopez homicide primarily and the recognition that we as a community have to do better.



Nathan lives in Sonoma County's first district represented by Supervisor Rebecca Hermosillo.

Second District

Casey Jones

I'm son of an Air Force pilot veteran of the Second World War. I was raised in Southern Cal and came north to attend UC Berkeley. I graduated from UC Law San Francisco, and practiced business litigation in San Francisco for 10 years. I fled north to find a sane balance between work, marriage, child raising and personal life. I was Assistant City Attorney for the City of Napa for 26 years, retiring at the end of 2022. My practice included advice to and advocacy for city officials and initiatives at all levels. I worked closely with city management and police command staff and line officers in all aspects of law enforcement, including policy development, training, accountability, liability claims, litigation, and trial. I believe that law enforcement is a crucial, complex cornerstone of our self-governance, and that citizen oversight is vital to law enforcement's health, effectiveness, and responsiveness to the needs of citizens. Since retiring I'm providing legal services to other lawyers part time, continuing to coach high school mock trial as I have for many years, reading, writing, cooking, drinking good beer and wine, and trying to break 70 on the golf course.



Third District

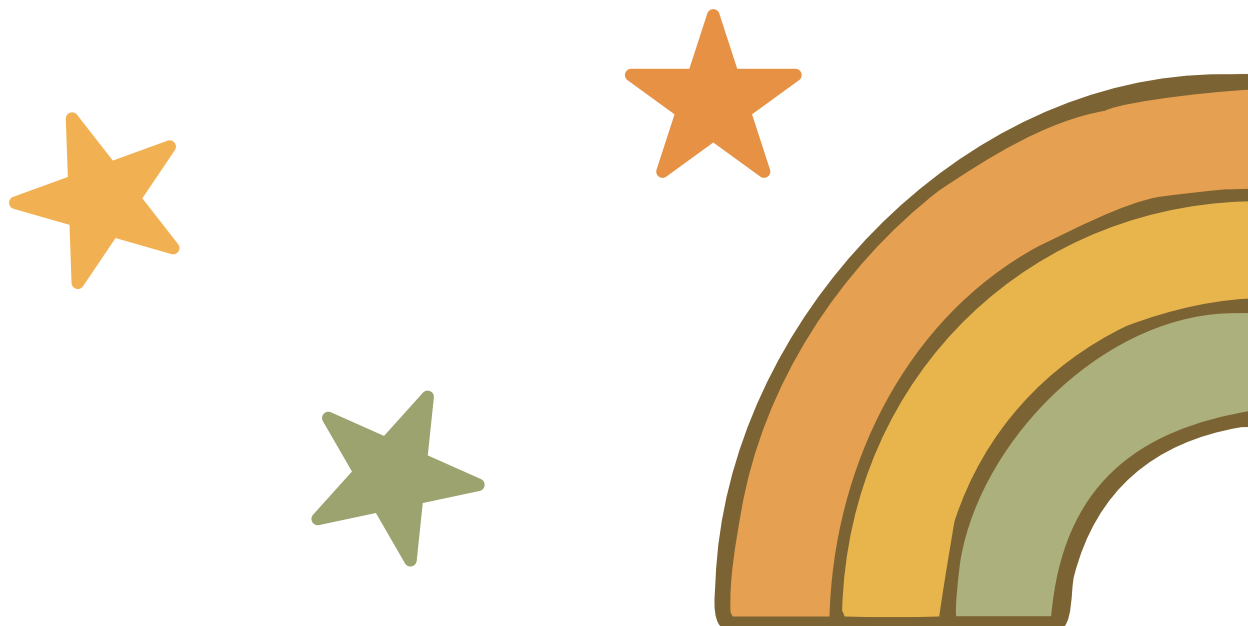
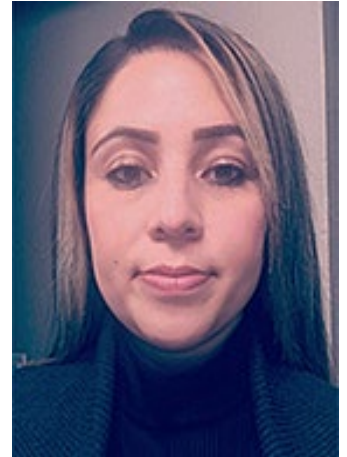
Lorena Barrera

Ms. Barrera attended the University of California, Merced where she received a Bachelor's Degree in Political Science. Following her graduation, she moved to Sonoma County to attend Sonoma State University as a graduate student in the field of Public Administration. In 2016, she received her Master's Degree.

While in school, Lorena served as a volunteer in various internships in all levels of government. During this time, she became aware of the disconnect between people and their representatives and how this disconnect contributes to a lack of understanding in what government does or should be doing for people. Around this time, Lorena began working as a staffer for a member of Congress where she was exposed to policy analysis and became more aware of the loopholes that exist in policy that affect both the public and the public agencies.

As a minority in society, setting an example in the community is of great importance to Ms. Barrera. She believes in informing and educating people in order to strengthen communities.

As a resident of Sonoma County, Ms. Barrera seeks opportunities that will allow her to serve as a community representative because she cares about making a difference for everyone. Ms. Barrera has served on Sonoma County's Commission for the Status of Women (CSW) since 2015 where she currently serves as the vice-chair. As a member of the CSW, she served on the CSW's Mental Health Ad Hoc Committee where she did research on mental health and the stigmas that surround mental health conditions. Ms. Barrera brings to the CAC her experience studying mental health conditions and she will be instrumental in integrating that information into the CAC's outreach and policy work.



Trevor Ward

As a native of Sonoma County, my passion for politics and community service began in high school through my involvement in competitive speech and policy debate. I studied music, political science and history at Santa Rosa Junior College and leadership at the University of The Nation's in Kona, Hawaii.

After that, I worked with Youth With A Mission in Los Angeles where I had the privilege of serving on a short-term outreach trip to the Philippines and Thailand and then leading two separate trips to Costa Rica and Panama. My roles during that time covered everything from working at an orphanage, to partnering with an anti-human trafficking organization and building a new service campus in the jungle.

From my early childhood until now, my heart and priority have always been to serve those who are poor and most vulnerable. Like many Americans, my passion for police oversight began after the murder of George Floyd in 2020. I was an activist and strong supporter of Measure P which established broader authority for the Independent Office of Law Enforcement Review and Outreach.

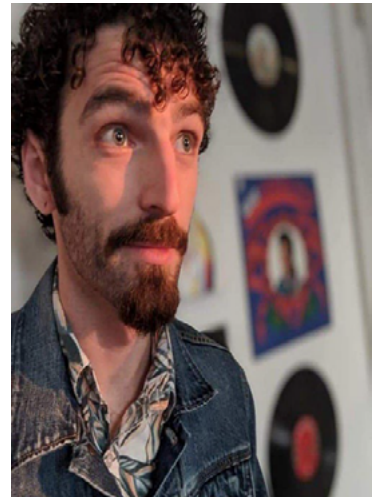
I had the honor and privilege of being appointed to the Community Advisory Council in the Fall of 2023 to represent District 3 (central Santa Rosa). While our work covers a broad range of topics, my greatest passion and hope is to serve individuals at the Sonoma County Jail and to make sure that we are giving them the best care and rehabilitation possible.

Fourth District

John Azevedo

John Azevedo is a life-long resident of Sonoma County having grown up on a ranch near Healdsburg, California. John still lives near Healdsburg with his wife Alicia and daughter Micaela. As the Senior Vice President of Farming for Jackson Family Wines (JFW), he has responsibility for vineyard teams and vineyards all over coastal California. John continues to manage his family's vineyard in addition to his responsibilities at Jackson family Wines.

John has been involved with various community groups and holds a Bachelor of Science Degree from California State University at Fresno in Plant Science with an emphasis in viticulture. He is also a graduate of the California Agricultural Leadership Program class 37, where he had the opportunity to visit Asia in conjunction with consulting with other international agricultural leaders. John has a commitment to the

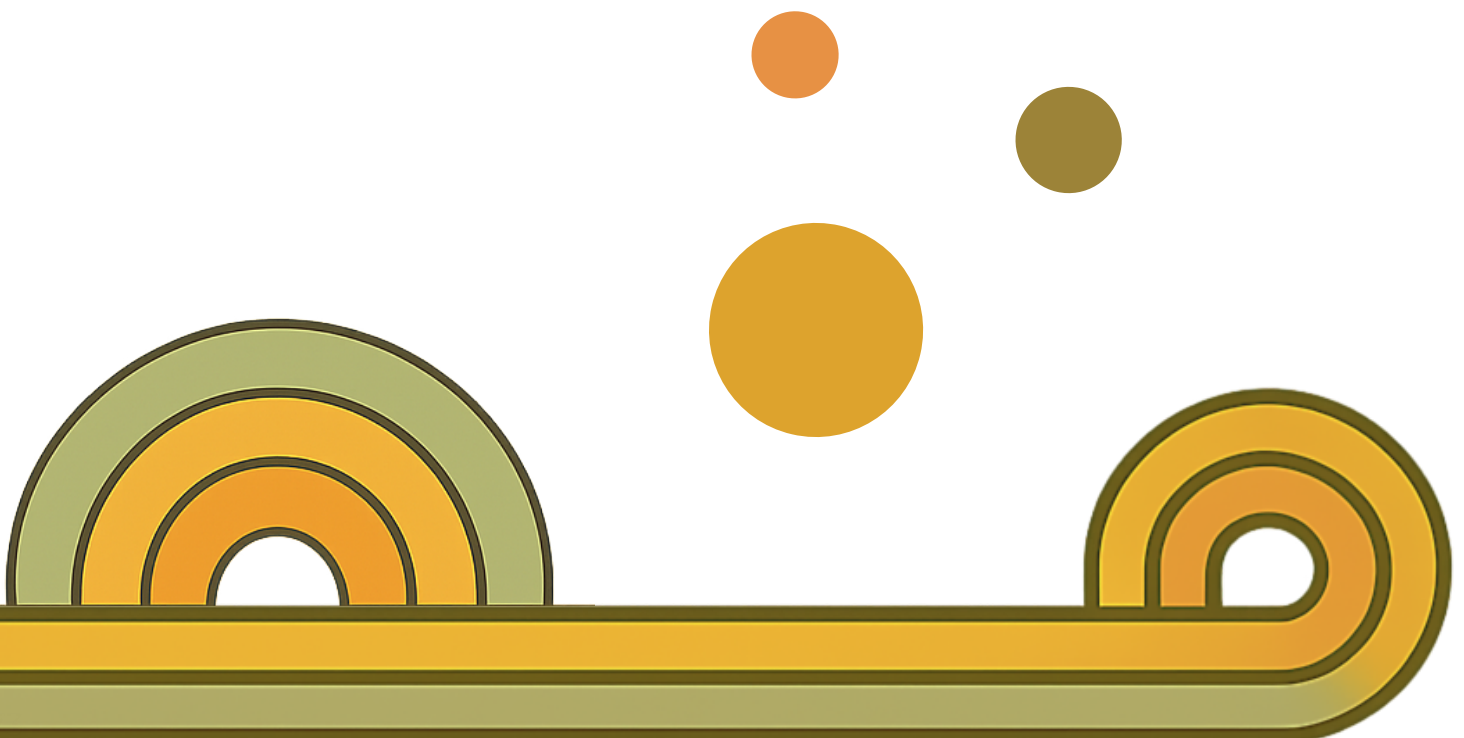


community that includes strong beliefs in equity, safety, and the process of continual improvement, all of which drove his interest in participating with the IOLERO CAC.

Michael Miller

Michael Miller grew up in the East Bay. He graduated from Chabot Junior College with an AA degree in the Administration of Justice. He worked as a police officer from 1974-1984 in San Mateo with assignments throughout the San Francisco Peninsula. He was involved in two shootings. He was sued twice for unfounded allegations of excessive force, with both being dismissed. His nephew was killed by an Antioch police officer in an excessive force situation. He moved to Santa Rosa in 1983.

While working full time for Big 4 Rents and as a legal research clerk he attended night law school at Empire College School of Law, graduating *magna cum laude* in 1988 as the valedictorian of his class. Since then, he has worked as a general civil litigator, having tried over 70 cases to jury verdict in a host of subjects, including defending law enforcement in excessive force cases. In 1997 he was a founding partner in the Santa Rosa law firm Perry, Johnson, Anderson, Miller & Moskowitz LLP which has become the largest law firm north of the Golden Gate Bridge. He has extensive volunteer experience as a Big Brother and Court Appointed Special Advocate (CASA) with 5 different youths over a near 20-year span. He has also been active with local efforts promoting equity and inclusion, meeting weekly since George Floyd's murder with a mixed-race group of elders striving to figure out ways to meaningfully impact the community in positive ways for the benefit of all.



Fifth District

Imelda Martinez De Montano

I was born in state of Michoacán, Mexico. I arrived in the United States in 1995. I became a U.S. citizen in 2015. I have been happily married for the last 30 years, and I am the mother of 2 daughters and 1 son. I have lived in the West County area (Forestville & Guerneville) for 29 years.

In 2022, I began volunteering as a Health Promoter in the Russian River area. I like to contribute my service and be able to help with essential items that are a benefit to our Latinx community. Several of our families who live in the west county are experiencing a form of isolation and disconnection, due to a lack of essential information and resources that are necessary for our members of the Spanish- speaking community. This was one of the reasons that motivated me to apply to the IOLERO, Community Advisory Council. To learn about the important work, they are doing and be able to bring this educational information to our Latinx community.

I am grateful for this opportunity that has been given to me as a monolingual with Spanish being my native language. I want to continue contributing to my community and be helpful in bringing educational information to our West County area.



Nancy Pemberton

Nancy Pemberton obtained her B.A. degree at San Francisco State University and her J.D. degree at Berkeley Law School (then known as Boalt Hall). For most of her legal career, she specialized in representing defendants charged with capital crimes and facing possible execution, both as an attorney and mitigation specialist. Now retired from legal representation, she works part-time writing and editing content for a website used by capital litigators.

As part of her litigation practice, Ms. Pemberton volunteered time to train attorneys and investigators in capital litigation issues, presenting at legal and investigative conferences and seminars throughout the country. She also taught a clinical course, the Art of Investigation, at Santa Clara University Law School in conjunction with the Law School's Innocence Project.

In 2000, Ms. Pemberton and a fellow investigator co-founded the Institute for International Criminal Investigations (IICI), an organization that trains professionals in the investigation of human atrocities. She continues to sit on the IICI board. She also sat on the board of the



American Civil Liberties Union of Northern California for many years, including chairing the board for six of those years.

Having moved to Sonoma County in 2014, Ms. Pemberton became involved in the campaign to pass the Evelyn Cheatham Effective IOLERO Ordinance, also known as Measure P, adopted in November 2020 with the approval of almost 2/3 of the vote. She now serves on the Committee for Law Enforcement Accountability Now (CLEAN), a group dedicated to ensuring the robust implementation of Measure P.

Ms. Pemberton is delighted to serve on the Community Advisory Council. She believes that it is the responsibility of everyone in a democracy to oversee the people in law enforcement to whom they have granted such enormous responsibility and authority; and she aspires to live in a community where law enforcement officers and the people they serve view each other with mutual respect and trust. She looks forward to doing her part to achieve those goals.

Ms. Pemberton lives in Sonoma County's Fifth District represented by Supervisor Lynda Hopkins.

At-Large

Alberto Botello

Alberto Botello was born in Michoacan Mexico and has lived in Sonoma County since he was 3 years old when he immigrated with his family. He graduated from Windsor High School and attended the University of California Davis. He then returned to Sonoma County and worked with the Migrant Education program working with migrant families and students. He also worked with Boys and Girls Central Sonoma County, and the Volunteer Center of Sonoma County. He currently works for the Sonoma County Department of Child Support Services and California Human Development as their Camp Director for Camp Núñez.

He has always enjoyed volunteering his time and giving back to his community. He currently serves on the board of directors for 4Cs Sonoma County, Somos Windsor and the Active 20-30 club #50.

Alberto looks forward to using his background and experience to help engage the community in his work with IOLERO CAC.



Appendix B: CAC 2025 Strategic Workplan



Date: March 10, 2025

To: Sonoma County Board of Supervisors
Members of the Community Advisory Council (CAC)

From: Lorena Barrera, CAC Chair
Nancy Pemberton, CAC Vice-Chair
John Alden, IOLERO Director

Re: Work Plan from CAC 2025 Strategic Planning Workshop

Since 2022, the Community Advisory Council (CAC) has held a Strategic Planning Workshop, or retreat, at the beginning of each calendar year to review the prior year's work and to determine what tasks the CAC may focus on in the coming year. At this year's Workshop held on Saturday, February 22, 2025, the CAC discussed the use of the Ad Hoc Committees (ad hocs) in 2024, community engagement opportunities and ad hoc progress and policy areas for 2025. This memo documents the priorities identified by the CAC through its decision to retain several of its ad hocs from 2024, create a new ad hoc and define SMART (Specific, Measureable, Achievable, Relevant, and Time-Bound) goals for every ad hoc in order to focus more on concrete results for 2025.

Priority Policy Areas, Ad Hoc Progress And Smart Goals

For 2025, the CAC identified its completed work which included the following:

- a report with feedback written by the Recruitment, Hiring & Retention Best



Practices Ad Hoc Committee to the Sonoma County Sheriff's Office (SCSO) on its efforts to recruit and retain sworn employees

- a report containing findings in the analyzed data and three recommendations informed by the findings and grounded in best practices for accountability, transparency, and community engagement written by the Racial and Identity Profiling Act (RIPA) Ad Hoc Committee

Those reports can be found on the CAC portion of the IOLERO webpage here¹.

The unfinished work that was retained for continuation in 2025 is outlined below and includes the framework of setting effective objectives as mentioned above (SMART goals).

1. RIPA Ad Hoc Committee

- a. Present the RIPA report to the CAC and facilitate public access and awareness on March 5, 2025.
Make the RIPA report publicly available and distribute it to CAC members ahead of the March meeting (per Brown Act), either in full or via a link included in the agenda. Present and discuss the report during the meeting and consider issuing a press release to further inform the public and notify the media for potential news coverage.
- b. Engage SCSO in a discussion on the RIPA report and determine the best method for community presentation. *The goal is to have a meeting in March or April, however that is dependent on SCSO availability.*
Following the March CAC meeting, invite SCSO to discuss the RIPA report, its findings, and the best method for community presentation (e.g., joint public forum). Also, explore whether SCSO can assume responsibility for ongoing data collection and analysis.
- c. Establish a long-term RIPA data analysis process by the end of June 2025
Develop a proposal for IOLERO and SCSO outlining a routine RIPA data analysis process. If SCSO does not assume responsibility, recommend that CAC or IOLERO continue this work annually with consultant support, specifically expertise from a data scientist consultant like Dr. Maskaly.

¹ [https://sonomacounty.ca.gov/administrative-support-and-fiscal-services/independent-office-of-law-enforcement-review-and-outreach/community-advisory-council-\(cac\)/cac-reports-and-recommendations](https://sonomacounty.ca.gov/administrative-support-and-fiscal-services/independent-office-of-law-enforcement-review-and-outreach/community-advisory-council-(cac)/cac-reports-and-recommendations)

- d. Finalize recommendations to the RIPA Board for improving data collection and reporting by the end of August 2025

Incorporate feedback from SCSO and the community to finalize recommendations for the RIPA board on improving data collection and reporting. Potential areas include collecting residence data and enabling departments to save data for future analysis.

2. Community Engagement Ad Hoc Committee

- a. Ensure CAC Meeting Agendas Align with Measure P.
Beginning with the next CAC meeting (in March), incorporate Measure P's language regarding CAC's purpose in every CAC meeting agenda by updating all meeting agendas.

- b. Expand Community Outreach through presentations in Supervisorial Districts.
Increase CAC's engagement with community organizations and residents across supervisorial districts. Measurable success looks like tracking outreach efforts and participation levels at each presentation.

Actions & Milestones:

- By April CAC meeting: Contact at least 15 organizations from the identified outreach list.
- By the end of 2025: Deliver presentations to at least three audience groups, including one at the District 5 office in Guerneville.

- c. Engage with the "Agenda for Action" (AFA) and Community Leaders.
Determine how CAC can contribute to mitigating systemic inequities as identified in AFA.

Actions & Milestones:

- By April CAC meeting: Ad hoc committee members review and become familiar with AFA goals.
- By June CAC meeting: Engage with community leaders in two unincorporated census tracts identified in AFA.
- By September CAC meeting: Identify and propose specific ways CAC can contribute to its mission.

- d. Finalize CAC Playbook for adoption & implementation by the May CAC Meeting.
Complete and approve the CAC playbook drafted by staff and consultants. Ensure finalization by May CAC meeting, incorporating any necessary revisions.

- e. Develop and execute a Publicity Plan for the 2024-25 Annual Report. Increase accessibility and visibility of the annual report's findings. Actions & Milestones:
By the July 2025 CAC meeting:
 - Create a concise, digestible summary of key findings.
 - Identify and implement outreach methods (e.g., social media, website, newsletter).
 - Secure media engagement (print, radio, and TV) to discuss the findings.

- f. Enhance the visibility of IOLERO & CAC through media & technology. Improve public awareness of CAC and IOLERO through bilingual video content and technology at outreach events.
Actions & Milestones:
 - Request immediate action from IOLERO to translate the current Sonoma County video into Spanish.
By the August CAC meeting:
 - Request that Sonoma County produce a bilingual (English/Spanish) video about CAC's role.
 - Secure a laptop or other technology for tabling events to play these videos continuously with subtitles, ensuring hands-free operation.

3. Canine Policy Ad Hoc Committee

- a. Develop and Finalize Canine Policy Recommendations for CAC Approval and Submission

- b. Ensure a thorough review of the canine program, gather necessary input, and finalize policy recommendations for CAC adoption and dissemination.

Key milestones:

- By March 10: Conduct a follow-up meeting with canine program leaders to gather insights and feedback. (Lt. Kidder is coordinating scheduling.)
- By April 16: Complete information gathering and submit draft comments and policy recommendations to SCSO for initial review before CAC circulation.
- By May 16: Finalize the committee's comments and recommendations and submit them to IOLERO for inclusion in the June CAC agenda packet.

- By June 3: Present the final comments and recommendations at the CAC meeting for discussion, refinement, and potential adoption.
- By June 13: Distribute the CAC's adopted comments and policy recommendations to the Sheriff and other relevant stakeholders.

New Priorities For 2025

The CAC held a discussion with Sheriff Eddie Engram and community members on opportunities for better transparency and community engagement around the topic of U.S. Immigration and Customs Enforcement (ICE). At the Workshop, community members expressed concern about possible immigration enforcement operations conducted by ICE in Sonoma County. Sheriff Engram, who was in attendance at the Workshop, addressed the topic by explaining that due to several laws in California, there are limitations on how the SCSO can interact with ICE. He also clarified how communication is handled between ICE and the SCSO and he encouraged the community to learn more by contacting the SCSO directly and helping with correcting misinformation that exists around this topic. Finally, he discussed changes to SCSO policy that further limits when SCSO reports to ICE the release of persons from jail.

Considering the policy shifts taking place on a national level around immigration enforcement operations, the CAC decided that an effective way to help protect the public and enhance trust between law enforcement and the community would be to create a new ad hoc focused on improving engagement with the community about the SCSO's policies around communication and interactions with ICE. Three CAC members volunteered to lead this effort.

We believe that the CAC's Work Plan for 2025 reflects a move toward improved productivity, better collaboration with the SCSO and our local organizations and stronger community engagement.

On behalf of the CAC,

Lorena Barrera and Nancy Pemberton
CAC Chair and Vice Chair

John Alden
Director of IOLERO

Appendix C: Completeness Checklist

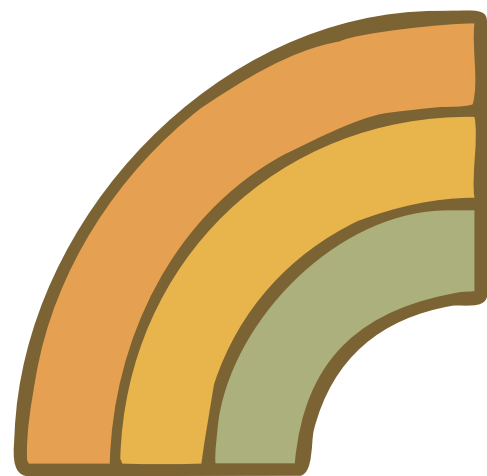
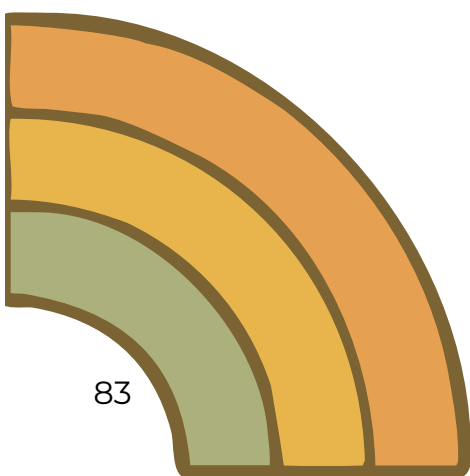
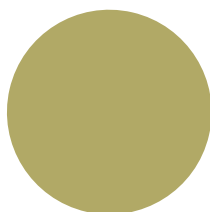
IOLERO Completeness Checklist

For Auditing IAD Investigations

Preliminary Items	Mark when Completed
Identify and list the issues/allegations reasonably raised by the incident.	
Fact Development	
Timely gather documentary / video / audio evidence, including BWC files and Dispatch files. If any are missing, explain why in the report.	
Timely interview subjects, complainants, witnesses (recorded by audio/video)	
** Explore and where necessary, challenge, factual assertions to ensure objective record; eliminate shorthand use of phrases/terms of art, and/or require they be substantively explained on the record. Interviews need not be adversarial, but they do need to be probative. Avoid leading questions and questions suggesting justifications for the deputy's conduct. Obtain non-interrupted narratives from interviewees when possible and clarify/elaborate with targeted follow up questions. ** Have deputies identify with as much specificity as possible the facts known to or perceived by the deputy at the time actions were taken, and the source of those facts, as they relate to the incident under review	
Use of Force Matters (in addition to the foregoing)	
Establish whether (and specifically how) use of force factors listed in policy were considered by deputy(s)	
Establish whether (and specifically how) <u>proportionality</u> was considered by deputy(s)	
Establish whether (and specifically how) <u>de-escalation</u> was considered by deputy(s)	
Establish specific facts which deputy believed showed reasonableness of the force under the Fourth Amendment.	

Critical Incident Protocol Matters (when SCSO is Employing Agency)	
Check for compliance with the SCSO policy, not just assessing whether the deputy committed a crime. For example, check for compliance with the Critical Incident Protocol at the scene and for deputy compliance with SCSO de-escalation policy and training. This will often require a separate interview of involved deputies/witnesses to address SCSO policy, not just reliance on the investigating agency's interviews.	
Remember that the District Attorney or Attorney General's decision not to file criminal charges does not tell us whether there was a violation of policy.	
Evaluation Of Law / Policy	
Explain SCSO's interpretation of the law/policy in issue.	
Summarize training, if relied on by deputy.	
Summarize experience, if relied on by deputy.	
Summarize deputy understanding of law/policy.	
Apply Law / Policy To Facts	
Analyze facts under the law/policy as interpreted by SCSO.	
Identify ambiguity in law/policy.	
Identify and address factual contradictions and credibility issues, such as the impact of missing BWC or contradictions in witness testimony.	
Address whether deputy was directed by superiors to take specific action.	
Use of Force Matters (in addition to the foregoing)	
Provide complete analysis of balancing of interests under <i>Graham v. Connor</i> .	
Provide complete analysis of relevant use of force factors in SCSO Policy and California statutes.	
Provide complete analysis of <u>proportionality</u> balance.	
Provide complete analysis of <u>de-escalation</u> considerations.	

Critical Incident Protocol Matters (when SCSO is Employing Agency)	
Do not rely solely on the District Attorney's evaluation of whether charges will be filed <u>criminally</u> ; conduct separate analysis of whether deputy followed SCSO <u>policy</u> . This will often involve separate administrative interviews.	
Written Report	
All the facts and analysis used to reach a conclusion should be stated here, so the reader does not have to go elsewhere to understand the report.	
Avoid terms-of-art, or otherwise explain such terms. For example, instead of writing "the deputy de-escalated," instead write "The deputy stepped back a few paces, and told the man to take his time to explain what was going on."	
Summary of how record supports the finding of sustained, exonerated, unfounded, or not sustained, based on statutory and policy definitions. Use the "Allegation, Policy, Facts, Conclusion" four-sentence paragraph as a start.	
Preservation Of Record	
Place all materials and evidence in AIM.	
Retain all BWC files in Evidence.com.	



Appendix D: Timeliness Checklist

IOLERO Timeliness Checklist For Auditing Internal Affairs Investigations

Aside from the 1-year statute of limitations, these deadlines are not defined by law or SCSO/IOLERO policy. Instead, they are intended to reflect best practices to (a) allow SCSO a reasonable time to conduct a thorough and timely investigation, (b) allow IOLERO reasonable time to conduct a thorough and timely audit, and (c) allow SCSO sufficient time to consider IOLERO's audit before the 1-year statute of limitations.

Deadlines	Deadline Met?
SCSO: Send the investigation to IOLERO within 14 calendar days after command staff completes its review.	
SCSO: Send the investigation to IOLERO within 225 days after the date of complaint or after discovering the relevant employee conduct. Alternate deadline for investigations that are subject to tolling: Send the investigation to IOLERO at least 140 days before the statute of limitations expires.	
IOLERO: Send the preliminary audit to SCSO within 120 days after receiving SCSO's investigation.	
SCSO: Complete the investigation before the 1-year statute of limitations in compliance with SCSO Policy 1010.6.5.	

Appendix E: SCSO Demographics

		Sworn Patrol									
Race/Ethnicity & Gender	6/5/2019	1/23/2020	6/22/2021	7/5/2022	2/16/2023	3/22/2024	11/21/2024				
US-Hispanic or Latin	27 10.0%	30 10.9%	33 12.2%	30 11.8%	29 11.3%	33 12.3%	36 13.4%				
US-White	232 85.6%	233 85.0%	227 83.8%	208 81.6%	208 80.9%	213 79.5%	209 77.7%				
US-American Indian/Alaska	1 0.4%	1 0.4%	1 0.4%	1 0.4%	1 0.4%	2 0.7%	2 0.7%				
US-Native Hawaiian Pac	N/A	N/A	N/A	0 0.0%	0 0.0%	0 0.0%	1 0.4%				
US-Asian	5 1.8%	4 1.5%	4 1.5%	4 1.6%	3 1.2%	4 1.5%	5 1.9%				
US-Black or African	2 0.7%	2 0.7%	2 0.7%	2 0.8%	2 0.8%	2 0.7%	2 0.7%				
US-Not Specified	3 1.1%	3 1.1%	3 1.1%	9 3.5%	13 5.1%	14 5.2%	14 5.2%				
US-Two or More Races	1 0.4%	1 0.4%	1 0.4%	1 0.4%	1 0.4%	0 0.0%	0 0.0%				
TOTAL	271	274	271	255	257	268	269				
Female	14 5.2%	17 6.2%	14 5.2%	12 4.7%	13 5.1%	16 6.0%	16 5.9%				
Male	257 94.8%	257 93.8%	257 94.8%	243 95.3%	244 94.9%	252 94.0%	253 94.1%				
TOTAL	271	274	271	255	257	268	269				

		Sworn Management									
Race/Ethnicity & Gender	6/5/2019	1/23/2020	6/22/2021	7/5/2022	2/16/2023	3/22/2024	11/21/2024				
US-Hispanic or Latin	4 17.4%	4 16.0%	3 11.1%	3 11.5%	3 11.1%	2 8.0%	3 12.0%				
US-White	17 73.9%	19 76.0%	23 85.2%	22 84.6%	22 81.5%	21 84.0%	19 76.0%				
US-American Indian/Alaska	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%				
US-Native Hawaiian Pac	N/A	N/A	N/A	0 0.0%	0 0.0%	0 0.0%	0 0.0%				
US-Asian	0 0.0%	0 0.0%	1 3.7%	0 0.0%	1 3.7%	1 4.0%	1 4.0%				
US-Black or African	2 8.7%	2 8.0%	0 0.0%	1 3.8%	1 3.7%	1 4.0%	1 4.0%				
US-Not Specified	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%				
US-Two or More Races	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	1 4.0%				
TOTAL	23	25	27	26	27	25	25				
Female	1 4.3%	2 8.0%	1 3.7%	1 3.8%	2 7.4%	3 12.0%	2 8.0%				
Male	22 95.7%	23 92.0%	26 96.3%	25 96.2%	25 92.6%	22 88.0%	23 92.0%				
TOTAL	23	25	27	26	27	25	25				

		Dispatchers									
Race/Ethnicity & Gender	6/5/2019	1/23/2020	6/22/2021	7/5/2022	2/16/2023	3/22/2024	11/21/2024				
US-Hispanic or Latin	0 0.0%	1 3.8%	3 11.5%	3 12.0%	3 12.5%	3 13.0%	4 16.7%				
US-White	25 89.3%	22 84.6%	21 80.8%	19 76.0%	18 75.0%	17 73.9%	18 75.0%				
US-American Indian/Alaska	1 3.6%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%				
US-Native Hawaiian Pac	N/A	N/A	N/A	0 0.0%	0 0.0%	0 0.0%	0 0.0%				
US-Asian	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	1 4.3%	0 0.0%				
US-Black or African	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%				
US-Not Specified	1 3.6%	2 7.7%	2 7.7%	3 12.0%	3 12.5%	2 8.7%	2 8.3%				
US-Two or More Races	1 3.6%	1 3.8%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%				
TOTAL	28	26	26	25	24	23	24				
Female	18 64.3%	19 73.1%	19 73.1%	18 72.0%	18 75.0%	16 69.6%	17 70.8%				
Male	10 35.7%	7 26.9%	7 26.9%	7 28.0%	6 25.0%	7 30.4%	7 29.2%				
TOTAL	28	26	26	25	24	23	24				

		Detention Support							
Race/Ethnicity & Gender	6/5/2019	1/23/2020	6/22/2021	7/5/2022	2/16/2023	3/22/2024	11/21/2024		
US-Hispanic or Latin	18 23.7%	17 23.6%	18 24.7%	18 27.7%	22 32.4%	26 33.8%	24 32.4%		
US-White	48 63.2%	45 62.5%	42 57.5%	38 58.5%	36 52.9%	37 48.1%	36 48.6%		
US-American Indian/Alaska	2 2.6%	1 1.4%	1 1.4%	1 1.5%	1 1.5%	1 1.3%	1 1.4%		
US-Native Hawaiian Pac	N/A	N/A	N/A	0 0.0%	0 0.0%	0 0.0%	0 0.0%		
US-Asian	2 2.6%	2 2.8%	3 4.1%	2 3.1%	2 2.9%	3 3.9%	3 4.1%		
US-Black or African	3 3.9%	4 5.6%	3 4.1%	2 3.1%	2 2.9%	3 3.9%	3 4.1%		
US-Not Specified	3 3.9%	3 4.2%	5 6.8%	4 6.2%	5 7.4%	7 9.1%	7 9.5%		
US-Two or More Races	0 0.0%	0 0.0%	1 1.4%	0 0.0%	0 0.0%	0 0.0%	0 0.0%		
TOTAL	76	72	73	65	68	77	74		
Female	45 59.2%	41 56.9%	41 56.2%	38 58.5%	39 57.4%	44 57.1%	44 59.5%		
Male	31 40.8%	31 43.1%	32 43.8%	27 41.5%	29 42.6%	33 42.9%	30 40.5%		
TOTAL	76	72	73	65	68	77	74		

		Technical Specialty							
Race/Ethnicity & Gender	6/5/2019	1/23/2020	6/22/2021	7/5/2022	2/16/2023	3/22/2024	11/21/2024		
US-Hispanic or Latin	1 4.2%	1 4.0%	1 4.0%	3 11.5%	3 13.0%	3 12.0%	3 10.7%		
US-White	21 87.5%	22 88.0%	22 88.0%	18 69.2%	16 69.6%	19 76.0%	21 75.0%		
US-American Indian/Alaska	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%		
US-Native Hawaiian Pac	N/A	N/A	N/A	0 0.0%	0 0.0%	0 0.0%	0 0.0%		
US-Asian	1 4.2%	1 4.0%	1 4.0%	2 7.7%	2 8.7%	2 8.0%	2 7.1%		
US-Black or African	1 4.2%	1 4.0%	1 4.0%	1 3.8%	1 4.3%	1 4.0%	1 3.6%		
US-Not Specified	0 0.0%	0 0.0%	0 0.0%	2 7.7%	1 4.3%	0 0.0%	1 3.6%		
US-Two or More Races	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.2%		
TOTAL	24	25	25	26	23	25	28		
Female	5 20.8%	5 20.0%	5 20.0%	6 23.1%	6 26.1%	6 24.0%	7 25.0%		
Male	19 79.2%	20 80.0%	20 80.0%	20 76.9%	17 73.9%	19 76.0%	21 75.0%		
TOTAL	24	25	25	26	23	25	28		

		Sworn Detention							
Race/Ethnicity & Gender	6/5/2019	1/23/2020	6/22/2021	7/5/2022	2/16/2023	3/22/2024	11/21/2024		
US-Hispanic or Latin	46 22.0%	52 24.2%	51 26.2%	51 26.7%	50 27.8%	58 30.5%	73 34.1%		
US-White	145 69.4%	141 65.6%	122 62.6%	115 60.2%	106 58.9%	104 54.7%	114 53.3%		
US-American Indian/Alaska	1 0.5%	1 0.5%	1 0.5%	1 0.5%	1 0.6%	2 1.1%	2 0.9%		
US-Native Hawaiian Pac	N/A	N/A	N/A	1 0.5%	1 0.6%	2 1.1%	0 0.0%		
US-Asian	4 1.9%	5 2.3%	4 2.1%	4 2.1%	3 1.7%	3 1.6%	4 1.9%		
US-Black or African	9 4.3%	9 4.2%	6 3.1%	9 4.7%	9 5.0%	9 4.7%	9 4.2%		
US-Not Specified	2 1.0%	5 2.3%	9 4.6%	9 4.7%	8 4.4%	10 5.3%	11 5.1%		
US-Two or More Races	2 1.0%	2 0.9%	2 1.0%	1 0.5%	2 1.1%	2 1.1%	1 0.5%		
TOTAL	209	215	195	191	180	190	214		
Female	51 24.4%	56 26.0%	52 26.7%	51 26.7%	53 29.4%	52 27.4%	31 14.5%		
Male	158 75.6%	159 74.0%	143 73.3%	140 73.3%	127 70.6%	138 72.6%	183 85.5%		
TOTAL	209	215	195	191	180	190	214		

		Management													
Race/Ethnicity & Gender		6/5/2019		1/23/2020		6/22/2021		7/5/2022		2/16/2023		3/22/2024		11/21/2024	
	US-Hispanic or Latin	3	15.0%	3	15.0%	2	9.5%	2	11.1%	2	9.1%	2	9.5%	2	9.5%
	US-White	16	80.0%	16	80.0%	18	85.7%	16	88.9%	20	90.9%	18	85.7%	18	85.7%
	US-American Indian/Alaska	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	US-Native Hawaiian Pac	N/A		N/A		N/A		0	0.0%	0	0.0%	0	0.0%	0	0.0%
	US-Asian	1	5.0%	1	5.0%	1	4.8%	0	0.0%	0	0.0%	1	4.8%	1	4.8%
	US-Black or African	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	US-Not Specified	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	US-Two or More Races	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
TOTAL		20		20		21		18		22		21		21	
Female		16 80.0%		16 80.0%		15 71.4%		14 77.8%		19 86.4%		18 85.7%		18 85.7%	
Male		4 20.0%		4 20.0%		6 28.6%		4 22.2%		3 13.6%		3 14.3%		3 14.3%	
TOTAL		20		20		21		18		22		21		21	

		Civilian Administration													
Race/Ethnicity & Gender		6/5/2019		1/23/2020		6/22/2021		7/5/2022		2/16/2023		3/22/2024		11/21/2024	
	US-Hispanic or Latin	3	11.1%	2	8.7%	3	11.5%	4	15.4%	5	16.7%	5	18.5%	6	23.1%
	US-White	23	85.2%	20	87.0%	20	76.9%	19	73.1%	21	70.0%	20	74.1%	18	69.2%
	US-American Indian/Alaska	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	US-Native Hawaiian Pac	N/A		N/A		N/A		1	3.8%	1	3.3%	0	0.0%	0	0.0%
	US-Asian	1	3.7%	1	4.3%	1	3.8%	1	3.8%	1	3.3%	1	3.7%	1	3.8%
	US-Black or African	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	US-Not Specified	0	0.0%	0	0.0%	1	3.8%	0	0.0%	1	3.3%	1	3.7%	1	3.8%
	US-Two or More Races	0	0.0%	0	0.0%	1	3.8%	1	3.8%	1	3.3%	0	0.0%	0	0.0%
TOTAL		27		23		26		26		30		27		26	
Female		26	96.3%	22	95.7%	25	96.2%	25	96.2%	28	93.3%	26	96.3%	25	96.2%
Male		1	3.7%	1	4.3%	1	3.8%	1	3.8%	2	6.7%	1	3.7%	1	3.8%
TOTAL		27		23		26		26		30		27		26	

		Law Enforcement Support													
Race/Ethnicity & Gender		6/5/2019		1/23/2020		6/22/2021		7/5/2022		2/16/2023		3/22/2024		11/21/2024	
US-Hispanic or Latin		9	25.7%	7	23.3%	8	25.8%	8	36.4%	7	21.9%	11	29.7%	12	37.5%
US-White		28	80.0%	22	73.3%	20	64.5%	12	54.5%	20	62.5%	20	54.1%	17	53.1%
US-American Indian/Alaska		0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
US-Native Hawaiian Pac				N/A		N/A		0	0.0%	0	0.0%	0	0.0%	0	0.0%
US-Asian		1	2.9%	1	3.3%	2	6.5%	2	9.1%	1	3.1%	2	5.4%	2	6.3%
US-Black or African		0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
US-Not Specified		1	2.9%	0	0.0%	1	3.2%	0	0.0%	4	12.5%	4	10.8%	1	3.1%
US-Two or More Races		0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
TOTAL		39		30		31		22		32		37		32	
Female		30	85.7%	24	80.0%	24	77.4%	18	81.8%	26	81.3%	29	78.4%	26	81.3%
Male		9	25.7%	6	20.0%	7	22.6%	4	18.2%	6	18.8%	8	21.6%	6	18.8%
TOTAL		39		30		31		22		32		37		32	

	Sonoma County Demographic						
Race/Ethnicity	6/5/2019	1/23/2020	6/22/2021	7/5/2022	2/16/2023	3/22/2024	11/21/2024
US-Hispanic or Latin	26.6%	27.2%	27.2%	20.3%	28.3%	28.9%	30.3%
US-White	63.5%	63.1%	63.1%	61.5%	61.5%	60.6%	59.1%
US-American Indian/Alaska	0.4%	2.2%	2.2%	2.3%	2.3%	2.3%	2.3%
US-Native Hawaiian Pac	N/A	N/A	N/A	0.4%	0.4%	0.4%	0.5%
US-Asian	4.2%	4.6%	4.6%	4.8%	4.8%	5.0%	5.1%
US-Black or African	1.3%	2.1%	2.1%	2.1%	2.1%	2.2%	2.2%
US-Not Specified	N/A	N/A	N/A	N/A	N/A	N/A	N/A
US-Two or More Races	3.7%	4.0%	4.3%	4.3%	4.3%	4.4%	4.5%

<https://www.census.gov/quickfacts/fact/table/sonomacountycalifornia#>

