INDEPENDENT OFFICE OF LAW ENFORCEMENT REVIEW AND OUTREACH

SONOMA COUNTY, CALIFORNIA

TRIENNIAL REVIEW

Review Period

July 1, 2022 - June 30, 2025

Pivot Consulting Group

ABOUT THIS REVIEW

This triennial review was conducted by Pivot Consulting Group for the Independent Office of Law Enforcement Review and Outreach pursuant to Sonoma County Code §2-396.

Review Period
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About Pivot Consulting Group
Pivot Consulting Group is a consulting firm specializing in civilian oversight, public safety, and organizational leadership. Pivot works with government agencies and other stakeholders to strengthen accountability, organizational effectiveness, leadership, and public trust, and to develop practical approaches to complex public sector challenges.

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I. Executive Summary

This report presents the results of the first triennial review of the Independent Office of Law Enforcement Review and Outreach (IOLERO) conducted pursuant to Sonoma County Code §2-396 covering period from July 1, 2022 through June 30, 2025. The review assessed IOLERO's implementation of the authorities established by Measure P and evaluated the extent to which the Operational Agreement and Letters of Agreement align with those authorities.

Overall, the review found that IOLERO has matured into a professional and functioning civilian oversight agency that has substantially implemented the core responsibilities assigned by Measure P. During the review period, IOLERO maintained qualified leadership and staff, conducted audits and independent investigations, reviewed citizen complaints, issued public reports, and exercised its oversight authorities in a manner consistent with the accountability and transparency objectives that led to Measure P's adoption. The review also found evidence that IOLERO has continued to strengthen its oversight practices by refining audit methodologies, enhancing quality management processes, and improving collaboration with the Sonoma County Sheriff's Office.

Implementation varies across the authorities granted by Measure P. During the review period, IOLERO devoted most of its efforts to auditing Internal Affairs investigations and case specific reviews.[1] Broader responsibilities involving systemic analysis and organizational performance received less emphasis, largely because of resource constraints and the time required to conduct detailed case reviews. Given the office's developing staffing and organizational capacity, this concentration of resources allowed IOLERO to establish the professional oversight practices that now form the foundation of its program. Future expansion into systemic reviews, performance auditing, and other oversight activities should build upon this foundation without diminishing the quality or timeliness of IOLERO's established core responsibilities.

The review identified opportunities to further strengthen implementation through continued collaboration among stakeholders, particularly through increased communication with the County and the Sheriff's Office regarding access to information, early coordination during investigations, and procedures that support consistent application of audit expectations. These recommendations are principally directed toward strengthening the processes through which IOLERO and the Sheriff's Office implemented civilian oversight together, rather than assigning responsibility for implementation challenges to either organization alone. While stakeholders expressed differing perspectives regarding certain aspects of implementation, the review concludes that these issues primarily concern the practical exercise of existing authorities rather than the scope of the authorities granted by Measure P.

IOLERO has become an established component of Sonoma County's accountability framework. This report also includes a targeted assessment of IOLERO's jail oversight function and recommendations to strengthen oversight practices and operational effectiveness in this area. Continued organizational development, sustained collaboration among stakeholders, and

[1] Throughout this report, the terms *Internal Affairs* and *Professional Standards* are used interchangeably to refer to the Sheriff's Office function responsible for administrative investigations of employee misconduct.

implementation of the recommendations contained in this report will further advance the transparency, accountability, and public trust objectives envisioned by the voters.

II. Methodology

This review evaluated how IOLERO carried out the duties, responsibilities, and authorities established by Measure P, the Operational Agreement, and the applicable Letters of Agreement during the period of July 1, 2022 through June 30, 2025.

Authority Review and Document Analysis

The review used an authorities first approach, beginning with a review of Measure P, the Operational Agreement, and the applicable Letters of Agreement.[2] These authorities were incorporated into an Authority to Practice Matrix that compared IOLERO's established authorities and responsibilities with observed operational practices (**see Appendix A**).

The review examined publicly available annual reports, audit reports, independent investigation reports, policies, procedures, website materials, and other documents relevant to IOLERO's operations. These materials were used to assess how authorities were implemented in practice and to identify recurring themes, strengths, and opportunities for improvement.

Stakeholder Interviews

Pivot conducted interviews with a range of stakeholders, including IOLERO staff, Sonoma County Sheriff's Office personnel, County representatives, a labor representative, community stakeholders, and a subject matter expert (**see Appendix B**).

Interview information was used to understand operational practices, implementation challenges, working relationships, and differing perspectives regarding civilian oversight. Information obtained through interviews was considered alongside documentary evidence.

Comparative Benchmarking

Because the scope of this review was to evaluate how IOLERO has implemented the authorities and responsibilities established by Measure P, the review did not benchmark IOLERO against other oversight agencies as a whole. Instead, the review selectively considered civilian oversight agencies and other organizations to provide context regarding specific oversight functions,

[2]Letters of Agreement with the Deputy Sheriffs' Association (DSA), Deputy Sheriffs' Law Enforcement Management (DLSM), and Sonoma County Law Enforcement Managers' Association (SCLEMA) were provided for this review as well as the first amended agreements. The agreements and amendments are substantively similar across bargaining units and primarily reflect differences in implementation procedures and operational processes rather than IOLERO's core oversight authorities. Where both the original and First Amended versions were available, the review relied primarily on the First Amended SCLEMA Letter of Agreement because it is the current governing agreement and is substantively representative of the corresponding agreements with the other bargaining units.

practices, or organizational approaches and to inform observations and recommendations where appropriate (**see Appendix C**).

Scope and Limitations

Due to California confidentiality laws governing peace officer personnel records, the review was not provided access to confidential personnel investigation files, Internal Affairs investigative files, or other nonpublic records maintained by the Sonoma County Sheriff's Office (Sheriff's Office) or IOLERO. However, Senate Bill 1421 and Senate Bill 16 expanded public access to specified categories of peace officer records, resulting in substantially greater public availability of Sheriff's Office investigations, IOLERO audits, and related oversight materials than existed when Measure P was adopted.[3] As a result, this review was able to evaluate a broader body of publicly available oversight work than would have been possible under prior law.

Accordingly, the review relied on publicly available audits, annual reports, governing documents, stakeholder interviews, and other relevant public materials. Because a majority of the publicly available audits were completed by a single auditor, the available sample may not fully reflect the range of auditing approaches and practices employed by IOLERO during the review period. While these limitations restricted the ability to independently verify certain underlying investigative activities and the completeness of populations subject to review, the information reviewed provided a sufficient basis to assess how IOLERO's authorities are structured and implemented in practice.

The review did not evaluate matters expressly excluded from the scope of work, including disputes regarding subpoena authority and related legal questions that were subject to pending litigation when the engagement began. Although that litigation was subsequently resolved, these issues remained outside the approved scope of the review.[4] In addition, IOLERO removed the Community Advisory Council (CAC) and IOLERO's community outreach functions from the scope of this review.

Throughout the review, stakeholders frequently identified uncertainty regarding the interaction between Measure P, state law, collective bargaining requirements, and the agreements governing IOLERO's access to information and oversight authorities. As a result, several significant issues affecting IOLERO's implementation of Measure P could not be evaluated within the scope of this review.

In addition, some stakeholders expressed the view that portions of Measure P are difficult to implement operationally as written and require further legal clarification or amendment before they can be fully realized in practice. Accordingly, this report does not evaluate the legal sufficiency of Measure P or recommend changes to its statutory framework, which were outside

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[3] Senate Bill 1421 (2018), codified at California Penal Code §§ 832.7-832.8; Senate Bill 16 (2021), codified at California Penal Code § 832.7.

[4] *Independent Office of Law Enforcement Review and Outreach v. Sonoma County Sheriff's Office*, A171763 (Cal. Ct. App. Mar. 26, 2026), review denied, California Supreme Court, July 8, 2026; Bob Egelko, "Oversight of sheriff's offices affirmed by California Supreme Court," *San Francisco Chronicle* (July 8, 2026).

the scope of the review. Instead, the review evaluated how IOLERO implemented its authorities within the legal and operational environment that existed during the review period.

Recommendations are intended to improve IOLERO's governance, operations, and implementation under its existing authorities and practices. The review recognizes that broader policy decisions regarding the structure, resources, and future evolution of civilian oversight in Sonoma County remain matters for the Board of Supervisors, collective bargaining where applicable, the Legislature, and other appropriate governmental processes.

National Best Practices in Civilian Oversight

In addition to evaluating implementation of Measure P, the review considered nationally recognized principles of effective civilian oversight developed by the National Association for Civilian Oversight of Law Enforcement (NACOLE).[5] These principles reflect widely accepted professional practices regarding oversight independence, transparency, accountability, access to information, and public trust. While they do not establish legal requirements and were not used to determine compliance with Measure P, they provided professional context for evaluating oversight practices and informing observations and recommendations where appropriate.

Generally Accepted Government Auditing Standards

At IOLERO's request, the review also incorporated where appropriate, observations and recommendations informed by the principles and best practices reflected in Generally Accepted Government Auditing Standards (*the Yellow Book*). While this review was not conducted as a Yellow Book performance audit, those principles were considered in developing recommendations to strengthen governance, oversight, policies, and operational practices.

III. Professional Framework for Effective Civilian Oversight

The following principles summarize nationally recognized practices associated with effective civilian oversight. Collectively, they describe the organizational characteristics commonly associated with effective oversight systems and provide a useful framework for understanding many of the observations and recommendations discussed throughout this report. References to these principles are included where they offer additional professional context for the issues being evaluated.

1. **Independence**: Oversight agencies should operate free from actual or perceived influence by the law enforcement agency, elected officials, or other stakeholders. Organizational independence is essential to maintaining public confidence in oversight findings.

[5] National Association for Civilian Oversight of Law Enforcement (NACOLE), *Principles for Effective Oversight*, https://www.nacole.org/principles (last visited July 13, 2026).

2. **Clearly Defined Authority**: The oversight agency should possess clearly defined legal authority and jurisdiction sufficient to fulfill its mission. Ambiguity regarding authority can reduce effectiveness and create implementation challenges.
3. **Access to Information**: Effective oversight depends upon timely, independent access to records, personnel, facilities, and other information necessary to conduct meaningful reviews. Without adequate access, oversight agencies cannot independently verify facts or evaluate organizational performance.
4. **Access to Agency Leadership**: Regular communication with law enforcement leadership and Internal Affairs promotes collaboration, improves implementation of recommendations, and facilitates organizational improvement while preserving oversight independence.
5. **Full Cooperation**: Oversight functions most effectively when agency personnel cooperate with oversight activities, provide requested information, and participate in reviews consistent with legal protections and due process requirements.
6. **Sustained Stakeholder Support**: Long-term success depends upon continued support from elected officials, agency leadership, employees, community members, and other stakeholders. Oversight should remain effective beyond periods of crisis or public attention.
7. **Adequate Resources**: Oversight agencies require sufficient staffing, funding, training, and operational resources to perform audits, investigations, outreach, reporting, and organizational reviews in a timely manner.
8. **Public Reporting and Transparency**: Oversight agencies should regularly communicate their work through accessible public reports that explain findings, recommendations, trends, and organizational performance while respecting legal confidentiality requirements.
9. **Policy and Pattern Analysis**: Oversight should extend beyond individual cases to identify recurring issues, organizational risks, policy deficiencies, and systemic opportunities for improvement using data and evidence-based analysis.
10. **Community Outreach**: Oversight agencies should educate the public regarding their role, build relationships with stakeholders, and make oversight accessible to the communities they serve.
11. **Community Involvement**: Community members should have meaningful opportunities to provide input regarding oversight priorities and accountability issues affecting public trust.
12. **Confidentiality and Protection from Retaliation**: Oversight agencies must safeguard confidential information, protect individuals who provide information, and maintain professional standards that promote trust and credibility.
13. **Procedural Justice and Legitimacy**: Oversight should model fairness, impartiality, respectful treatment, transparency, and consistency throughout its own processes, thereby reinforcing confidence in both oversight and law enforcement accountability systems.

IV. IOLERO Performance Audit

Measure P requires that IOLERO be subject to a performance audit at least once every three years.[6] The purpose of this review is to evaluate how the authorities established by Measure P have been implemented in practice and whether the supporting agreements and operational structures align with those authorities.

The analysis that follows is organized according to the specific provisions of Sonoma County Code §§2-392 through 2-397.[7] Because Measure P has been implemented through the Operational Agreement and subsequently negotiated Letters of Agreement, the review considers these documents alongside the ordinance to assess how the statutory framework has been applied in practice.[8] For each authority, the review examines three related questions:

1. What authority or responsibility does Measure P establish?
2. To what extent has that authority been implemented in practice?
3. How do the Operational Agreement and Letters of Agreement align with the authority established under Measure P?

Measure P Implementation Findings Categories

1. **Fully Implemented**: The review found evidence that the authority or responsibility has been exercised in a manner consistent with the intent of Measure P. Any identified opportunities relate to enhancing existing practices rather than addressing implementation gaps.
2. **Substantially Implemented**: The review found sufficient evidence that the authority or responsibility has largely been exercised. However, additional staffing, resources, organizational capacity, or refinement would materially improve the office's ability to fully exercise or sustain the authority contemplated by Measure P.
3. **Partially Implemented**: The review found evidence that the authority or responsibility has been exercised in part, but significant aspects have not yet been fully exercised, developed, or consistently implemented.
4. **Not Implemented**: The review found little or no evidence that the authority or responsibility has been exercised.

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[6] Measure P refers to this process a performance audit; throughout the report it is also referred to as a review.

[7] Sonoma Cnty., Cal., Ordinance No. 6333 (Nov. 3, 2020), https://sonomacounty.gov/Main%20County%20Site/Administrative%20Support%20%26%20Fiscal%20Services/IOLERO/Documents/Archive/Department%20Info/_Right%20Column%20Content/Ordinance%20No.%206333.pdf (last visited July 10, 2026).

[8] *Sonoma County, Cal., Operational Agreement Between the Independent Office of Law Enforcement Review and Outreach and the Sonoma County Sheriff's Office*, https://sonomacounty.gov/Main%20County%20Site/Administrative%20Support%20%26%20Fiscal%20Services/IOLERO/Documents/Measure%20P%20Information/Operational-Agreement-IOLERO-Sonoma-County-Sheriff.pdf (last visited July 10, 2026); *County of Sonoma, Sonoma County Law Enforcement Association, & Independent Office of Law Enforcement Review and Outreach, First Amended Letter of Agreement*, https://sonomacounty.gov/Main%20County%20Site/Administrative%20Support%20%26%20Fiscal%20Services/IOLERO/Documents/Measure%20P%20Information/First-Amended-Letter-Agreement-IOLERO-SCLEA.pdf (last visited July 10, 2026).

5. **Outside the Scope of Review**: The provision, issue, or activity was not evaluated as part of this review because it was excluded from the approved scope of work or review methodology. Accordingly, no conclusions are offered regarding its implementation or effectiveness.

Authority Alignment Classifications

1. **Reflects Measure P:** The review found that the agreement is consistent with the authority established by Measure P and operationalizes that authority without materially altering its scope or intent.
2. **Expands Upon Measure P:** The review found that the agreement establishes additional procedures, processes, or operational guidance beyond the language of Measure P without materially limiting the authority established by Measure P.
3. **Narrows Measure P:** The review found that the agreement limits, conditions, or otherwise constrains the practical exercise of an authority established by Measure P while leaving the underlying authority unchanged.
4. **Creates or Contributes Ambiguity to Measure P:** The review found that the agreement contains language that may result in differing understandings regarding the scope, implementation, or practical exercise of an authority established by Measure P.
5. **Silent on Measure P Authority:** The review found that the agreement does not address the Measure P authority being evaluated. As a result, the agreement neither expands upon nor narrows the authority established by Measure P.

More than one classification may apply where an agreement is consistent with a Measure P authority while also expanding upon, narrowing, or creating or contributing to ambiguity regarding its implementation. These classifications are based on document review, stakeholder interviews, publicly available reports, audits, investigations, and other relevant information.

The review also considered NACOLE's Principle of *Clearly Defined Authority* when evaluating the relationship between Measure P and the agreements governing its implementation. This principle recognizes that effective civilian oversight is strengthened when the oversight agency's authority is clearly established and consistently understood by the entities responsible for implementing it.

Because Measure P operates within a complex environment involving labor agreements, confidentiality requirements, collective bargaining obligations, and evolving legal interpretations, the review also considers how those factors affect implementation in practice.

§2-392 Establishing Independent Law Enforcement Review and Outreach

Measure P Authority

Section 2-392 sets forth the findings and purposes underlying Measure P. The ordinance recognizes the significant authority exercised by Sheriff's Office personnel and establishes an independent civilian oversight framework to promote accountability, transparency, constitutional policing, public trust, community engagement, and effective oversight of Sheriff's Office operations. Measure P establishes IOLERO as the County's primary civilian oversight body while also recognizing the Board of Supervisors' governance role in supporting and overseeing the civilian oversight framework through appointments, funding, receipt of reports and recommendations, and periodic evaluation of the office's performance.

Unlike many of the provisions analyzed elsewhere in this report, §2-392 does not create a discrete operational authority or duty. Instead, it establishes the overarching purposes and governance framework that Measure P seeks to advance through IOLERO's authorities and the Board of Supervisors' governance responsibilities. Accordingly, the review evaluates §2-392 by assessing the extent to which IOLERO's activities, organizational development, and relationship with the Board of Supervisors have advanced the broader purposes identified by the ordinance.

Measure P Implementation

Classification: Fully Implemented

The review found that Sonoma County has implemented the purposes identified in §2-392 through the establishment and operation of IOLERO. During the review period, IOLERO conducted audits, independent investigations, complaint reviews, policy assessments, public reporting, and other oversight functions intended to improve accountability and transparency within the Sheriff's Office.

Stakeholders frequently cited the canine policy review as an example of oversight contributing to constructive policy change. Publicly available audits and annual reports demonstrate that IOLERO routinely identifies investigative deficiencies, recommends policy improvements, and evaluates Sheriff's Office compliance with applicable policies and procedures. The office has also exercised its independent investigation authority in high profile incidents, including two in-custody deaths, demonstrating that civilian oversight has become an active component of the County's accountability framework. Transparency has similarly increased during the review period. IOLERO's annual reports provide detailed public information regarding complaints, audits, recommendations, investigations, and other oversight activities.

Stakeholders expressed differing views regarding the sufficiency of access to information, the implementation of certain Measure P authorities, the appropriate balance between case specific review and systemic oversight, and the extent to which oversight activities have strengthened trust among all stakeholder groups. The review also identified opportunities to continue developing organizational capacity, including reducing audit backlogs, refining workload prioritization, strengthening recommendation tracking, and expanding trend analysis and performance audits oversight. These opportunities relate to the continued evolution of IOLERO's oversight program rather than implementation of the purposes established by §2-392.

Accordingly, the review concludes that the purposes identified in §2-392 are fully implemented. Independent civilian oversight is now an established and functional component of County government, and the review found evidence that Measure P has improved accountability, transparency, and public oversight.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects, Expands Upon, and Narrows Measure P

The Operational Agreement is consistent with the accountability, transparency, and oversight objectives identified in §2-392 and expands upon them by establishing the operational framework through which those objectives are implemented. The agreement establishes procedures governing complaint intake, audits, investigations, information sharing, reporting, and coordination between IOLERO and the Sheriff's Office. These provisions transform the broad policy goals articulated in Measure P into specific oversight processes and responsibilities.[9]

At the same time, the agreement relies heavily on coordination, notification, and information sharing mechanisms between IOLERO and the Sheriff's Office. While these provisions facilitate implementation of civilian oversight, they also require IOLERO to rely on the Sheriff's Office for certain notifications and records, which may affect IOLERO's ability to independently verify the completeness of certain information and incident populations.

2. Letters of Agreement

Classification: Reflects, Expands Upon, and Narrows Measure P

The Letters of Agreement reflect the civilian oversight objectives identified in §2-392 by establishing procedures through which audits, independent investigations, complaint reviews, and other oversight activities may occur involving represented employees.[10] The agreements expand upon Measure P by creating detailed procedural frameworks governing access to records, employee interviews, representation rights, investigative participation, reporting, and disclosure obligations.

However, the review also found that several provisions establish procedural requirements and limitations that are not expressly contained in Measure P. These include restrictions on IOLERO's direct access to certain records and information, limitations on direct communication with Sheriff's Office personnel during audits, provisions governing the timing and sequencing of audits and independent investigations, constraints affecting the exercise of independent investigative authority, and procedures that require coordination or approval before certain oversight activities may occur. These provisions have affected the practical exercise of several oversight authorities and contributed to differing interpretations of how Measure P's authorities should be implemented.

[9] Sonoma County, *Operational Agreement Between the Sonoma County Sheriff's Office and the Independent Office of Law Enforcement Review and Outreach* (Operational Agreement), §§ D.1-D.4.
[10] Letters of Agreement Between the County of Sonoma, Sonoma County Sheriff's Office, and Applicable Bargaining Units (Letters of Agreement), §§ IV(A)-IV(F).

Observation: County Governance and Independent Oversight

Section 2-392 recognizes independent civilian oversight as one mechanism through which the Board of Supervisors strengthens accountability, transparency, and public trust in Sheriff's Office operations. The review found that IOLERO serves as the primary structure through which this oversight function is carried out.

Stakeholder interviews consistently recognized that IOLERO's independence is fundamental to its credibility and effectiveness as a civilian oversight agency. At the same time, multiple stakeholders, including members of the Board of Supervisors, described the office as having become increasingly isolated from the County's routine administrative communication and coordination processes. While participants generally agreed that operational independence should be preserved, many distinguished independence from organizational isolation and identified opportunities for more regular communication regarding administrative priorities, significant initiatives, budget planning, and other County governance matters.

The review identified an opportunity to strengthen administrative communication without affecting IOLERO's operational independence. As a County department, IOLERO participates in planning, budgeting, staffing, procurement, and implementation of statutory responsibilities, and its independence does not preclude regular engagement with County leadership regarding these administrative matters. Several supervisors observed that more regular administrative communication with IOLERO would improve County governance and organizational coordination while preserving IOLERO's independence in conducting audits, investigations, findings, and recommendations.

The review found that the Board exercised its governance role primarily through establishing and maintaining the framework for independent civilian oversight, including funding IOLERO's operations, receiving annual reports, appointing CAC members, and maintaining the ordinance framework within which IOLERO operates. Supervisors generally described their role as supporting IOLERO's independence while recognizing the value of routine communication regarding significant administrative and organizational matters, rather than involvement in substantive oversight activities.

Recommendation #1: Establish Regular Executive-Level Communication Regarding Administrative and Operational Matters

IOLERO should establish regular executive-level meetings between the IOLERO Director and the County Executive Officer and participate in routine County department head meetings. These meetings should provide a forum to discuss organizational priorities, significant projects, implementation of Measure P, statutory obligations, budget development, staffing, procurement, and other administrative and operational matters that may affect County operations or require Board awareness.

These meetings should not include discussion of confidential investigations, audit findings prior to release, or other matters that could compromise IOLERO’s independence. Regular communication should provide the County Executive Officer with information necessary to keep the Board of Supervisors appropriately informed while preserving IOLERO's independent authority over audits, investigations, findings, and recommendations.

This recommendation is also consistent with NACOLE's Principles for Effective Civilian Oversight, particularly the principles of *Independence* and *Sustained Stakeholder Support*. These principles recognize that effective civilian oversight requires both operational independence and sustained institutional support from the governing body responsible for establishing, funding, and maintaining the oversight function.

Observation: Opportunities to Expand Performance Audit Oversight

The review found that IOLERO has established an effective process for auditing completed Internal Affairs investigations. Publicly available audits consistently demonstrate careful evaluation of investigative quality, evidentiary support, policy compliance, and investigative reasoning. As discussed elsewhere in this report, these audits have contributed to improvements in investigative quality and, in some instances, broader policy and procedural changes.

The review identified an opportunity to build upon this established audit function by incorporating additional performance audits. IOLERO's current audit work is primarily retrospective, focusing on completed Internal Affairs investigations after key operational decisions have already been made. While this remains an important oversight responsibility, performance audits provide an opportunity to evaluate broader organizational processes that support accountability and organizational effectiveness. Periodic performance audits could complement IOLERO's existing case audits by assessing how these processes operate in practice, identifying opportunities for improvement, and promoting continuous organizational learning.

Civilian oversight agencies may supplement traditional case audits with performance audits that examine broader accountability systems. Examples include periodic review of complaint screening and classification practices, supervisory review processes, critical incident review practices, body worn camera compliance, implementation of prior recommendations, training programs, early intervention systems, and other operational controls that support accountability. These reviews complement, rather than replace, traditional case audits by evaluating organizational systems rather than individual investigations.

For example, the Los Angeles County Office of Inspector General routinely evaluates use of force reporting, critical incident review processes, jail operations, and implementation of departmental reforms in addition to auditing completed investigations.[11] Similarly, the San Francisco Department of Police Accountability conducts audits of body worn camera compliance, complaint intake processes, and other accountability systems.[12] Oakland's Office of

[11] Los Angeles County Office of Inspector General, *Reports*, https://oig.lacounty.gov/reports/ (last visited July 10, 2026).
[12] San Francisco Dep't of Police Accountability, *Audits, Reviews, and Analysis*, https://www.sfgov.org/dpa/audits-reviews-and-analysis (last visited July 10, 2026).

Inspector General also monitors compliance with negotiated reforms, force reporting, training implementation, and early intervention systems.[13]

Expanding oversight in this manner would build upon IOLERO's existing strengths by broadening its focus from retrospective review to periodic evaluation of organizational performance. Such an approach may allow IOLERO to identify emerging issues earlier, provide more timely recommendations, and maximize the impact of its oversight resources without diminishing its existing audit responsibilities.

§2-393 Director and Staffing

Measure P Authority

Section 2-393 establishes the leadership and staffing structure of IOLERO, including the appointment of the Director and employment of staff necessary to carry out the office's responsibilities. The provision is intended to ensure that IOLERO possesses the leadership, expertise, independence, and organizational capacity necessary to perform civilian oversight functions.

Measure P Implementation

Classification: Substantially Implemented

The review found substantial evidence that Sonoma County has implemented the leadership and staffing framework contemplated by Measure P. During the review period, IOLERO maintained an appointed Director and professional staff responsible for conducting audits, independent investigations, policy review, complaint intake, community engagement, and administrative functions.

Stakeholders consistently reported that earlier staffing vacancies and recruitment challenges had largely been addressed and that the office successfully recruited personnel with experience in law, investigations, auditing, corrections, and civilian oversight. Multiple stakeholders identified the recruitment and retention of qualified personnel as one of IOLERO's most significant organizational accomplishments during the review period.

The review found evidence of substantial investment in professional development and specialized training. IOLERO staff completed training related to investigations, auditing practices, constitutional policing, use of force review, civilian oversight, and professional standards. Stakeholders generally viewed these efforts as strengthening the office's ability to perform its oversight responsibilities.

IOLERO's staffing and funding also reflect several elements of NACOLE's Principle of *Adequate Resources*, including the development and retention of qualified professional staff.

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[13] City of Oakland Office of Inspector General, *Annual Report* and *Office of Inspector General Work Plan*, https://www.oaklandca.gov/departments/office-of-inspector-general (last visited July 10, 2026).

Continued evaluation of staffing needs will be important as the office's workload and oversight responsibilities evolve.

Accordingly, the review concludes that §2-393 has been substantially implemented. The evidence demonstrates that Sonoma County has established and maintained the leadership, staffing, and professional capacity necessary for IOLERO to carry out its core responsibilities under Measure P. At the same time, additional staffing and resources would strengthen IOLERO's capacity to expand beyond its established core functions into expanded jail oversight operations, proactive and systemic reviews, trend analysis, and other oversight activities.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects Measure P

The Operational Agreement reflects the leadership and staffing framework established by Measure P. The agreement recognizes the role of the Director and IOLERO staff throughout the complaint review, audit, investigative, and reporting processes and assigns responsibilities consistent with those functions.[14] The agreement does not materially alter the appointment authority, qualifications, organizational structure, or staffing framework established by Measure P.

2. Letters of Agreement

Classification: Reflects Measure P

The Letters of Agreement recognize the role of the Director and IOLERO staff in conducting audits, independent investigations, complaint reviews, and other oversight activities involving represented employees.[15] The agreements further define how staff may exercise these authorities by establishing procedures governing access to information, participation in investigations, employee interviews, representation rights, and review of investigative materials. These provisions do not materially alter the leadership, qualifications, or staffing framework established by §2-393 and therefore reflect Measure P with respect to this authority.

§2-394(a) Performance of Powers and Duties Subject to Confidentiality Requirements

Measure P Authority

Section 2-394(a) requires IOLERO to perform its powers and duties subject to all applicable statutory and constitutional requirements relating to confidentiality and privilege.

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[14] Operational Agreement §§ D.1-D.4
[15] Letters of Agreement § IV(A)-IV(C).

Measure P Implementation

Classification: Fully Implemented

The review did not identify evidence that IOLERO has improperly disclosed confidential or privileged information while carrying out its oversight responsibilities. Publicly available audits, annual reports, independent investigations, and other reports reviewed as part of this assessment appear to appropriately balance transparency objectives with applicable legal restrictions governing personnel records, investigative information, privileged communications, and other protected information. Consistent with this finding, Sheriff's Office personnel interviewed during the review did not identify concerns regarding IOLERO's handling or public disclosure of confidential information.

The review also found that confidentiality requirements have a significant influence on how IOLERO communicates its work to the public. Many aspects of IOLERO's oversight activities involve access to records and information that cannot be publicly disclosed in full. As a result, the office must routinely balance competing interests of transparency, accountability, privacy, and legal compliance when preparing public reports and communicating findings. Changes in California law during the review period increased the amount of oversight work that could be publicly released, allowing IOLERO to provide greater transparency while continuing to protect confidential information where required by law.

Accordingly, the review concludes that §2-394(a) is fully implemented with IOLERO exercising its oversight responsibilities consistent with applicable confidentiality and privilege requirements.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects Measure P

The Operational Agreement incorporates confidentiality requirements governing the access, handling, retention, storage, and disclosure of investigative records, personnel information, and other protected materials. For example, the agreement requires IOLERO staff to comply with applicable confidentiality requirements when accessing Sheriff's Office information and establishes procedures governing the maintenance, security, and disclosure of records obtained through oversight activities.[16] These provisions are consistent with the limitations contemplated by §2-394(a) and provide an operational framework for protecting confidential information while permitting oversight access.

2. Letters of Agreement

[16] Operational Agreement §§ D.3(a)-(c), D.4(a)-(e).

Classification: Reflects Measure P

The Letters of Agreement contain numerous provisions governing confidentiality, access to records, investigative information, personnel files, interview materials, and disclosure of protected information. [17] For example, the Letters of Agreement require IOLERO to maintain the confidentiality of records obtained through the oversight process and provide that records will be disclosed or redacted in accordance with applicable law and in consultation with County Counsel when necessary.[18] These provisions are consistent with Measure P's requirement that IOLERO perform its duties subject to applicable confidentiality and privilege requirements.

§2-394(b)(1) Receipt and Review of Citizen Complaints

Measure P Authority

Section 2-394(b)(1) authorizes IOLERO to receive and review citizen complaints and to forward those complaints to the Sheriff for review and investigation. The section also designates IOLERO as an official location for members of the public to submit complaints regarding Sheriff's Office personnel.

Measure P Implementation

Classification: Fully Implemented

The review found that IOLERO actively exercises the complaint intake, review, and referral functions. During the review period, IOLERO received 130 complaints, including 55 complaints in FY 2022-23, 31 complaints in FY 2023-24, and 44 complaints in FY 2024-25.[19] Annual reports, stakeholder interviews, and supporting documentation demonstrate that complaints received by IOLERO are documented, tracked, reviewed, and referred for investigation when appropriate.

During FY 2023-24, IOLERO implemented an internal case management database to support complaint and audit tracking, workflow management, and public reporting.[20] The database enhances IOLERO's ability to track its work and report on oversight activities.

Stakeholders generally viewed complaint intake as a mature and routine component of the County's civilian oversight framework. The availability of an independent location for filing complaints was frequently cited as an important feature of the oversight system because it provides community members with an alternative to reporting concerns directly to the Sheriff's Office.

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[17] Letters of Agreement §§ IV(A), IV(B), IV(F).
[18] Letters of Agreement § IV(F)(i)-(ii).
[19] Complaint totals reported in IOLERO's annual reports have varied across reporting years as historical complaint data have been updated and refined. Unless otherwise noted, this report relies on the complaint statistics reported in the FY 2024-25 Annual Report for consistency. See IOLERO, *FY 2024-25 Annual Report*, at 13.
[20] IOLERO, *FY 2023-24 Annual Report*, at 16, 47.

The review also found that IOLERO's complaint intake process is generally consistent with NACOLE's Principles of *Community Involvement*. By providing an independent mechanism for members of the public to submit complaints, the process facilitates community participation in the civilian oversight.

The review also considered concerns raised by the Sheriff's Office regarding the consistency, completeness, and clarity of complaint intake practices. These concerns included whether complaints were being captured in a uniform manner and whether sufficient information was consistently collected to support effective investigation. Although these steps occurred after the review period, stakeholder interviews indicate that IOLERO has taken steps to strengthen intake procedures, including enhanced internal review processes, improved documentation practices, and efforts to ensure that complaints are appropriately categorized and forwarded for investigation.

While complaint intake requires continued attention to documentation quality and coordination between IOLERO and the Sheriff's Office, the review found that IOLERO actively exercises the authority as contemplated under Measure P. Accordingly, the review concludes that §2-394(b)(1) is fully implemented.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects and Expands Upon Measure P

The Operational Agreement reflects IOLERO's authority to receive, review, and refer citizen complaints while expanding upon Measure P by establishing detailed procedures governing complaint intake, referral, tracking, notification, communication, and investigative review. For example, the agreement requires complaints received by either IOLERO or the Sheriff's Office be entered into the AIM system, the Sheriff's Office investigations management database. It also establishes notification and assignment procedures and defines the respective responsibilities of IOLERO and the Sheriff's Office during complaint processing and investigation.[21] These provisions operationalize the complaint intake and referral authority beyond the framework established by Measure P itself.

2. Letters of Agreement

Classification: Reflects Measure P

The Letters of Agreement generally do not materially alter IOLERO's authority to receive, review, and forward citizen complaints for investigation. Instead, they primarily establish procedures governing what occurs after a complaint involving a represented employee enters the investigative process, including investigative review, access to investigative materials, employee

[21] Operational Agreement § D.1(a)-(f).

interviews, representation rights, case specific reporting, and independent investigations.[22] Those provisions are evaluated under the Measure P authorities governing the corresponding investigative and oversight functions. Accordingly, with respect to §2-394(b)(1), the Letters of Agreement reflect IOLERO's authority to receive and forward citizen complaints for investigation.

§2-394(b)(2) Categories Subject to Review, Audit, and Analysis

Measure P Authority

Section 2-394(b)(2) establishes the categories of complaints, incidents, and investigations that are subject to automatic review, audit, and analysis by IOLERO. These categories define the core scope of civilian oversight contemplated by Measure P and include citizen complaints, uses of force, constitutional violations, bias related complaints, sexual misconduct allegations, dishonesty allegations, civil litigation, racial profiling data, and matters of significant public interest.

Measure P Implementation by Category

The review found substantial evidence that IOLERO conducts oversight activities within many of these categories and routinely reviews citizen complaints, administrative investigations, use of force incidents, and other matters falling within its jurisdiction. In exercising this authority, IOLERO generally relies on information, referrals, notifications, and investigative records provided through Sheriff's Office processes. At present, no independent mechanism exists for IOLERO to verify that all incidents subject to Measure P have been identified and reported for review. As a result, neither IOLERO nor this review could independently verify the completeness of the underlying population of incidents subject to review under Measure P.

This limitation is particularly relevant to categories that require population level analysis, such as racial profiling data, civil litigation, as well as to broader trend analysis across oversight categories. Accordingly, the analysis below focuses on the extent to which IOLERO exercised its oversight authority within each category based on available records, annual reports, publicly available audits and investigations, and stakeholder interviews.

§2-394(b)(2)(i) Citizen Complaints Filed with IOLERO

Classification: Fully Implemented

The review found evidence that members of the public routinely use IOLERO as an independent avenue for submitting complaints regarding Sheriff's Office personnel. During the review period, IOLERO received 130 citizen complaints. Of those, the majority originated directly with IOLERO rather than being referred by the Sheriff's Office. In FY 2022-23, IOLERO received 55 complaints, of which 10 originated at the Sheriff's Office. In FY 2023-24, IOLERO received 31

[22] Letters of Agreement §§ IV(A)-(C).

complaints, including 16 originating at the Sheriff's Office. In FY 2024-25, IOLERO received 44 complaints, of which 15 originated at the Sheriff's Office. [23]

The review also found that IOLERO's complaint handling practices are generally consistent with NACOLE's Principle of *Procedural Justice and Legitimacy*. Community stakeholders who are familiar with the complaint process or assisted others in submitting complaints consistently described IOLERO staff as responsive, respectful, and willing to listen to community concerns. Stakeholders also reported that complaints were processed promptly and that IOLERO staff made reasonable efforts to explain the process, answer questions, and assist complainants in identifying appropriate avenues for resolution when concerns fell outside the office's jurisdiction. These practices support public confidence in the complaint process by reinforcing fair, respectful, and consistent treatment of individuals who raise concerns.

Unlike several other categories analyzed under §2-394(b)(2), this authority is exercised independently of Sheriff's Office referral processes. Although some complaints originate with the Sheriff's Office, most complaints received during the review period were initiated directly through IOLERO. Accordingly, the review concludes that this component of §2-394(b)(2) is fully implemented.

§2-394(b)(2)(ii)&(vii) Uses of Force

Classification: Fully Implemented

The review found evidence that IOLERO has exercised its authority to review complaints, investigations, and uses of force by Sheriff's Office personnel. Measure P establishes two related but distinct, oversight authorities. Section 2-394(b)(2)(ii) authorizes IOLERO to review complaints or investigations involving uses of force, while §2-394(b)(5)(vii) more broadly authorizes IOLERO to review uses of force by Sheriff's Office personnel, regardless of whether the force becomes the subject of a citizen complaint.

In FY 2022-23, IOLERO audited 27 Sheriff's Office administrative investigations, including five administrative reviews, three Internal Affairs investigations, and nineteen citizen complaint investigations, including twelve allegations categorized as unnecessary or excessive use of force.[24] In FY 2023-24, IOLERO completed 48 audits, including 15 allegations categorized as unnecessary or excessive use of force.[25] The annual report separately notes that IOLERO reviewed five Main Adult Detention Facility (MADF) use of force incidents involving wrist locks, controlled takedowns, and knee strikes. IOLERO generally agreed that the force used was minimal and complied with constitutional requirements, proportionality principles, and de-escalation expectations, while also identifying opportunities for more thorough analysis in the Sheriff's Office reviews.[26] In FY 2024-25, IOLERO reported nine use of force allegations among the matters audited or investigated. Publicly available audits provide additional evidence of this work, including the Nathan Smart officer involved shooting audit, the Ryan Uhl use of force

[23] IOLERO, *FY 2024-25 Annual Report*, Complaints and Audits for Fiscal Year 2024-2025, at 13.
[24] IOLERO, *FY 2022-23 Annual Report*, Number and Type of Investigations Audited, at 12-13.
[25] IOLERO, *FY 2023-24 Annual Report*, Cases Audited by IOLERO, at 48-49.
[26] IOLERO, *FY 2024-25 Annual Report*, at 15.

review, and the Roberto Perez Hildebrand canine deployment audit. These reviews demonstrate that IOLERO evaluates investigative completeness, proportionality, de-escalation efforts, policy compliance, witness interviews, and whether investigative findings are supported by the available evidence.[27]

Overall, use of force review appears to be one of IOLERO's most mature oversight functions. The annual reports and publicly available audits demonstrate regular review of force incidents arising in patrol operations, detention settings, canine deployments, officer involved shootings, and citizen complaints. The review did not identify evidence that IOLERO declined or failed to review use of force matters provided through its established oversight processes. At the same time, as discussed in the Authority Alignment and §2-394(e), IOLERO does not maintain an independent mechanism for verifying the completeness of the population of use of force incidents subject to review. This limitation concerns the practical ability to identify the full review population rather than the quality or regularity of the reviews IOLERO performs once matters are identified. Accordingly, the review concludes that the authorities established by §§2-394(b)(2)(ii) and 2-394(b)(5)(vii) are fully implemented based on the matters identified and available for review.

§2-394(b)(2)(iii) Alleged Constitutional Violations

Classification: Fully Implemented

The review found evidence that IOLERO evaluates allegations involving constitutional issues when they arise within complaints, use of force investigations, in-custody incidents, and other matters subject to review. Annual reports and publicly available audits demonstrate that constitutional considerations are frequently incorporated into IOLERO's analysis of Sheriff's Office investigations, particularly in areas involving use of force, detention operations, search and seizure issues, due process concerns, and equal protection considerations. For example, the FY 2024-25 annual report identified four allegations categorized as "Constitutional Rights (Patrol)" violations among the matters audited or investigated during the review period.[28]

Publicly available audits indicate that constitutional issues are generally evaluated within the context of individual complaints as part of IOLERO's oversight process. In the Nathan Smart officer involved shooting audit, IOLERO evaluated the sufficiency of the Sheriff's Office investigation and whether the available evidence supported conclusions regarding the reasonableness of force and policy compliance. Similarly, the Ryan Uhl use of force review and the Roberto Perez Hildebrand canine deployment audit examined issues related to proportionality, necessity, de-escalation, and the adequacy of investigative findings, including issues with constitutional implications. The Donald Miller in-custody death review also addressed concerns regarding the adequacy and independence of the administrative investigation into a custodial death.

[27] IOLERO, *FY 2024-25 Annual Report*, at 81-83 (providing IOLERO's Completeness Checklist), see also IOLERO Audit Reports, *Nathan Smart Officer-Involved Shooting Audit*; *Ryan Uhl Use of Force Audit*; *Roberto Perez Hildebrand Canine Deployment Audit*.

[28] IOLERO, *FY 2024-25 Annual Report*, at 15.

Accordingly, the review concludes that this category is fully implemented. The available evidence demonstrates that IOLERO routinely evaluates constitutional issues when they arise in matters under review.

§2-394(b)(2)(iv) Bias Based Policing and Discrimination Complaints

Classification: Fully Implemented

The review found evidence that IOLERO reviews complaints alleging bias based policing, discrimination, and related misconduct when such allegations are presented through the complaint process. Annual reports demonstrate that allegations involving bias are included within the categories of complaints reviewed and audited by IOLERO. During the review period, IOLERO reviewed 20 allegations categorized as "Bias" as part of its audit and investigative workload.[29]

The review also found that bias related allegations are incorporated into IOLERO's broader review of complaint investigations, use of force incidents, and administrative investigation reviews. In those matters, IOLERO evaluates whether investigations adequately addressed allegations, whether findings are supported by the available evidence, and whether applicable policy requirements were properly applied.

Accordingly, the review concludes that this category is fully implemented. IOLERO routinely reviews and audits bias related complaints consistent with Measure P.

§2-394(b)(2)(v) Sexual Misconduct Allegations

Classification: Fully Implemented

The review found evidence that allegations involving sexual misconduct fall within IOLERO's review authority and are reviewed when investigated by the Sheriff's Office. Annual reports demonstrate that IOLERO audits investigations involving allegations of sexual misconduct when such matters arise. During the review period, IOLERO reviewed 16 allegations categorized as "Sexual assault/Prison Rape Elimination Act (PREA)," reflecting active exercise of this authority during the review period.[30]

The review further found that sexual misconduct allegations are incorporated into IOLERO's broader audit and investigative processes. As with other categories of misconduct, IOLERO evaluates the adequacy of the underlying investigation, the sufficiency of the evidence supporting investigative findings, compliance with applicable policy requirements, and the reasonableness of the Sheriff's Office's conclusions.

[29] IOLERO, *FY 2022-23 Annual Report*, at 13; *FY 2023-24 Annual Report*, at 49; *FY 2024-25 Annual Report*, at 15.
[30] IOLERO, *FY 2022-23 Annual Report*, at 13; *FY 2023-24 Annual Report*, at 49; *FY 2024-25 Annual Report*, at 15.

Because these matters frequently involve confidential personnel, custodial, and PREA-related information, relatively few publicly available audits provide detailed examples of IOLERO's analysis. This limits the amount of publicly available information regarding this function but does not, by itself, indicate an implementation gap.

Accordingly, the review concludes that this category is fully implemented. Available evidence demonstrates that IOLERO reviews allegations of sexual misconduct when such matters arise and applies its established audit methodology to those investigations.

§2-394(b)(2)(vi) Dishonesty Allegations

Classification: Fully Implemented

The review found evidence that IOLERO reviews allegations involving truthfulness, integrity, credibility, and honesty when such issues arise during complaint investigations, administrative reviews, and audits. Annual reports demonstrate that dishonesty allegations are included among the categories of misconduct reviewed by IOLERO. During the review period, IOLERO reviewed 17 allegations categorized as dishonesty.[31]

Issues related to credibility, accuracy of reporting, completeness of documentation, and investigative integrity also arise in IOLERO's broader audit work even when dishonesty is not the primary allegation under review. Publicly available audits demonstrate that IOLERO evaluates whether investigative conclusions accurately reflect the available evidence and whether documentation supports the findings reached.

Accordingly, the review concludes that this category is fully implemented. IOLERO reviews dishonesty allegations when they arise and routinely evaluates issues affecting credibility, documentation, and investigative integrity.

§2-394(b)(2)(viii) Civil Litigation Involving Force or Misconduct

Classification: Substantially Implemented

The review found evidence that IOLERO established and utilized a process for identifying and reviewing civil litigation involving the Sheriff's Office during the review period. IOLERO's 2023-24 Annual Report describes a Civil Lawsuit Audit Program developed in cooperation with County Counsel and Human Resources/Risk Management through which IOLERO periodically reviewed civil claims involving the Sheriff's Office and its personnel.[32]

As part of this process, County Counsel and Human Resources/Risk Management provided IOLERO with lists of closed civil litigation claims, which IOLERO compared against matters already received from the Sheriff's Office Internal Affairs Division. This cross-check allowed

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[31] IOLERO, *FY 2022-23 Annual Report*, at 13; *FY 2023-24 Annual Report*, at 49; *FY 2024-25 Annual Report*, at 15.
[32] IOLERO, *FY 2023-24 Annual Report*, at 28-31.

IOLERO to determine whether corresponding investigative files had been provided for audit and to identify qualifying matters that had not otherwise entered IOLERO's audit caseload.

The 2023-24 Annual Report states that IOLERO reviewed twelve civil litigation claims for Fiscal Year 2021-22 and found that all were already subject to review and audit through other triggering circumstances.[33] For Fiscal Year 2022-23, IOLERO reviewed seven additional civil litigation claims and identified two matters for which it had not yet received corresponding materials for review. The report explains that many civil litigation matters were already included in IOLERO's caseload because they also involved another basis for review, such as a complaint, use of force, or significant public attention. IOLERO's 2024-25 Annual Report further demonstrates the continued review of civil claim matters during the final year of the triennial review period, identifying completed audits of matters originating as civil claims.[34]

These practices demonstrate that IOLERO exercised its authority to identify and review civil litigation matters and developed a systematic mechanism for verifying that qualifying cases were included within its audit population. However, the available documentation does not establish that every civil litigation matter falling within Measure P's requirements was identified and reviewed throughout the entire review period. Accordingly, the review concludes that this authority was substantially implemented.

§2-394(b)(2)(ix) Racial Profiling Data

Classification: Not Implemented

Measure P specifically identifies racial profiling data as a category subject to review and analysis. The review did not observe evidence that racial profiling data is routinely incorporated into IOLERO's oversight activities. While annual reports reference broader issues of equity and accountability, the review identified little evidence of systematic analysis of racial profiling data, recurring demographic trends, or population level assessments based on stop data or related datasets. Accordingly, the review concludes that this category is not implemented.

§2-394(b)(2)(x) Matters of Significant Public Interest or Media Attention

Classification: Fully Implemented

The review also found that IOLERO exercises its authority to review matters of significant public interest. During the review period, IOLERO completed two independent investigative reviews of in-custody deaths and conducted audits involving officer involved shootings, serious uses of force, detention operations, and other critical incidents. Collectively, the annual reports and publicly available audits demonstrate that IOLERO consistently applies independent

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[33] IOLERO, *FY 2023-24 Annual Report*, at 29-30.
[34] IOLERO, *FY 2024-25 Annual Report*, Civil Claims at 59-60.

oversight to incidents receiving heightened public attention and uses those reviews to evaluate investigative quality, policy compliance, and opportunities for organizational improvement.

Although Measure P authorizes IOLERO to review matters of significant public interest, some completed independent investigative reviews, including reviews of in-custody deaths, remain confidential under California law. As a result, the public understanding of IOLERO's work in these cases is limited to the summaries contained in the annual reports rather than the underlying investigative reports. This creates a disconnect between the public importance of these incidents and the transparency of the oversight work performed. During the review period, this limitation was partially offset by expanded public disclosure laws that made certain categories of audits and investigations publicly available, but no comparable disclosure mechanism applies to all IOLERO independent investigative reviews.

Some stakeholders expressed concern that IOLERO's focus on highly visible incidents can create a perception that oversight efforts are disproportionately directed toward matters already receiving significant public scrutiny. The review was unable to independently assess this concern because its evaluation of individual case work was limited to publicly available audits, investigations, and reports. Those materials are disproportionately associated with incidents receiving significant public attention and do not necessarily reflect the full scope of IOLERO's oversight activities. While annual report summaries suggest that similar review methodologies are applied across a broader range of matters, the review lacked access to a sufficiently representative sample of nonpublic case files to independently verify that conclusion.

Accordingly, the review concludes that this category is fully implemented. Available evidence demonstrates that IOLERO routinely exercises oversight authority in matters of significant public interest.

Overall Measure P Classification for §2-394(b)(2)

Classification: Substantially Implemented

IOLERO has exercised its oversight authority across most of the categories identified in §2-394(b)(2), including citizen complaints, uses of force, constitutional violations, bias based policing, dishonesty allegations, civil litigation, and matters of significant public interest. The review found that IOLERO established a process for identifying and reviewing qualifying civil litigation matters, including a cross-checking process designed to identify cases that had not otherwise entered its audit caseload. However, the review found little or no evidence of that IOLERO routinely exercised its authority to review racial profiling data as a distinct category of oversight. Accordingly, the review concludes that §2-394(b)(2) has been substantially implemented because implementation is established across most statutory categories but is not uniform across all categories identified in Measure P.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects, Expands Upon, and Creates or Contributes Ambiguity to Measure P

The Operational Agreement reflects §2-394(b)(2) by recognizing IOLERO's authority to review complaints, investigations, uses of force, and other matters subject to civilian oversight and by establishing procedures through which those matters are identified, referred, audited, and reported. The agreement expands upon Measure P by creating administrative processes governing notification, information sharing, audit coordination, investigative review, and communication between IOLERO and the Sheriff's Office.[35]

At the same time, the Operational Agreement creates ambiguity regarding the extent to which IOLERO may independently identify matters falling within the categories enumerated in Measure P. Measure P broadly requires IOLERO to review and analyze specified categories of complaints, incidents, and investigations, while the Operational Agreement generally implements that authority through notification, referral, and information sharing processes administered by the Sheriff's Office. Although the agreement provides IOLERO access to completed investigations and the ability to search certain investigative records within AIM, it does not establish a clear mechanism through which IOLERO may independently verify that all matters falling within Measure P's review categories have been identified and provided for review.[36] As a result, the agreement creates ambiguity regarding the extent to which IOLERO can independently verify that all matters falling within Measure P's review categories have been identified and provided for review. Stakeholders expressed differing interpretations regarding whether the agreement merely operationalizes Measure P or affects the practical exercise of the authority by making oversight dependent upon Sheriff's Office identification and transmission of information.

2. Letters of Agreement

Classification: Reflects and Narrows Measure P

The Letters of Agreement recognize IOLERO's authority to review the categories of complaints, incidents, and investigations identified in Measure P and establish procedures governing how audits, reviews, and independent investigations involving represented employees are conducted. For example, the Letters of Agreement require the Sheriff's Office to notify IOLERO when investigations are complete and ready for review and provide IOLERO access to completed investigative files through AIM.[37] The agreements also establish procedures governing IOLERO's review of completed investigations, including its authority to identify incomplete, biased, or deficient investigations and procedures governing further investigative activity.[38]

The agreements generally structure IOLERO's review around matters identified and transmitted through Sheriff's Office investigative processes. Although these procedures provide IOLERO with access to matters identified for review, the Letters of Agreement do not establish an

[35] Operational Agreement §§ D.1, D.3.
[36] Operational Agreement §§ D.1(h), D.3(a).
[37] Letters of Agreement § IV(A)(v).
[38] Letters of Agreement §§ IV(B)(i), IV(D)(i)-(iii).

independent mechanism through which IOLERO can verify that the complete population of complaints, incidents, and investigations falling within §2-394(b)(2) has been identified for review. To that extent, the agreements narrow the practical exercise of IOLERO's categorical review authority by making review substantially dependent on notification and access processes that occur through the Sheriff's Office.

The Letters of Agreement also establish additional procedures affecting how IOLERO reviews matters within these categories, including limitations governing further investigative activity and the circumstances under which IOLERO may conduct or request additional investigation.[39] Certain provisions further condition the timing or manner in which those authorities may be exercised. [40] Because these provisions principally affect specific authorities governing access to information, interviews, and independent investigations, their practical effects are evaluated more fully under the Measure P provisions establishing those authorities.

These provisions do not eliminate IOLERO's authority to review the categories of complaints, incidents, and investigations identified in Measure P. However, they condition the practical exercise of that authority on Sheriff's Office notification and access processes, as well as procedural requirements, timelines, and labor related safeguards that are not expressly contained in the ordinance. As a result, the Letters of Agreement reflect the oversight framework established by Measure P while narrowing the manner in which certain review authorities may be exercised in practice.

Yellow Book Considerations

The Yellow Book emphasizes understanding the audited program, assessing risks, evaluating relevant internal controls, and obtaining sufficient and appropriate evidence to support audit findings and conclusions.[41] The standards further encourage auditors to focus audit resources on areas presenting the greatest risk and the greatest opportunity to improve government operations.[42]

The review found that IOLERO has developed a mature methodology for reviewing individual investigations and complaint files. However, most oversight activity remains focused on case specific reviews rather than broader organizational performance. Greater use of risk based and performance audit could support identification of recurring patterns, emerging risks, and systemic issues affecting Sheriff's Office operations.

Expanding the use of data analysis, including through continued development of IOLERO's internal case management database, would further support performance auditing, trend

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[39] Letters of Agreement §§ IV(A)(v) (providing that access to investigative materials generally occurs after completion of a Sheriff's Office investigation rather than contemporaneously during the investigation); IV(B)(i), IV(D)(i)-(iii) (establishing procedures governing requests for historical complaint information, employee interviews, independent investigations, and interaction with represented employees).

[40] Letters of Agreement § IV(D)(i)(a)-(b) (imposing further sequencing requirements and waiting periods that affect when an independent investigation may begin).

[41] U.S. Government Accountability Office, *Government Auditing Standards* (2018 Revision) (Yellow Book), https://www.gao.gov/yellowbook (last visited July 16, 2026), §§ 8.03-8.07, 8.90-8.92.

[42] Yellow Book §§ 8.06-8.07 (Audit Planning).

identification, workload management, and risk based oversight planning. Such analyses would complement, rather than replace, IOLERO's existing case review function by helping prioritize oversight resources toward areas presenting the greatest risk and potential for organizational improvement, consistent with the principles underlying the Yellow Book.[43]

Observation: Case Review Versus Systemic Oversight

The review found that IOLERO's oversight activities are primarily organized around individual complaints and investigations. While this approach is consistent with many of the categories identified in Measure P, it may limit the office's ability to fully analyze broader trends, recurring organizational issues, and population level patterns contemplated by the ordinance. As audit backlogs are addressed and resources permit, opportunities exist to devote additional resources to systemic reviews and trend analysis across categories specifically identified in Measure P.

Recommendation #2: Establish a Systemic Oversight Planning Process

As resources permit, IOLERO should establish a periodic planning process for selecting future systemic review projects that complement its case specific audit work. The process should use available oversight data and other indicators to identify recurring issues, emerging risks, and areas that may warrant broader organizational review. Relevant indicators may include potential complaint trends, litigation patterns, use of force data, racial profiling data, in-custody deaths, significant policy changes, and legislative developments.

IOLERO’s internal case management database should be used, where feasible, to support risk assessment, trend identification, and oversight planning. This process would provide a structured means of identifying opportunities for broader organizational analysis while preserving IOLERO’s established case review responsibilities.

Recommendation #3: Establish a Structured Case Notification and Coordination Process

The review recognizes that IOLERO has implemented an internal database to support case management, audit tracking, and public reporting. Building upon that capability, the Sheriff's Office and IOLERO should jointly establish a consistent process for identifying, communicating, and tracking matters subject to IOLERO review. The process should include timely case notification, a shared mechanism for tracking the status of investigations and audits, and structured coordination meetings at both the outset of each reviewable matter and following completion of the Sheriff's Office investigation before IOLERO finalizes its audit or review.

At a minimum, the tracking system should identify:

1. All incidents and investigations potentially subject to IOLERO review;
2. The basis for whether each matter is considered reviewable under Measure P;

[43] Yellow Book §§ 8.03-8.07 (Audit Planning—assessing risk and determining the nature, timing, and extent of audit procedures).

3. The status of the Sheriff's Office investigation;
4. The status of IOLERO's review or audit; and
5. Other key investigative and review milestones.

At the outset of each case, Internal Affairs and IOLERO should meet to discuss:

1. The allegations under review;
2. The policies potentially implicated;
3. The anticipated scope of the investigation;
4. Expected investigative steps;
5. Anticipated evidentiary issues;
6. The applicable IOLERO Audit Completeness Checklist, including any case specific audit expectations or evidentiary considerations; and
7. Any matters requiring early coordination.

Following completion of the Sheriff's Office investigation, but before IOLERO finalizes its audit or review, the parties should meet to discuss:

1. Any remaining questions regarding the investigation;
2. The rationale for significant investigative decisions;
3. Any operational or legal considerations relevant to the investigation;
4. The operational feasibility of proposed recommendations; and
5. Opportunities to improve future investigations or coordination between the agencies.

Establishing a consistent communication framework would support more complete identification of review populations, enhance transparency between the organizations, improve audit planning, reduce misunderstandings regarding review responsibilities, and support IOLERO's ability to fully exercise its oversight responsibilities under Measure P.

§2-394(b)(3) Whistleblower Complaints

Measure P Authority

Section 2-394(b)(3) authorizes IOLERO to act as a receiving and investigative agency for whistleblower complaints involving the Sheriff and extends applicable whistleblower protections to complaints received or investigated by IOLERO. IOLERO need not report such complaints to the Sheriff, including Internal Affairs.

Measure P Implementation

Classification: Outside the Scope of Review

This provision was excluded from the approved scope of review at the outset of the engagement because its implementation was the subject of pending litigation at that time. Although that litigation was resolved during the course of review, whistleblower investigations remained outside the approved scope of work. Accordingly, no conclusions are offered regarding its implementation or effectiveness.

§2-394(b)(4) Discipline Recommendations

Measure P Authority

Section 2-394(b)(4) authorizes IOLERO to make discipline recommendations, as appropriate, for officers who are the subject of IOLERO investigations.

Measure P Implementation

Classification: Substantially Implemented

This authority is distinct from IOLERO's routine audit function and is most directly applicable when IOLERO conducts an independent investigation involving the conduct of specific Sheriff's Office personnel.

During the review period, IOLERO completed independent investigations concerning in-custody deaths at the MADF. In Investigation 24-INVEST-0002, IOLERO independently evaluated the actions of specific Sheriff's Office personnel, including conduct that resulted in sustained policy violations and administrative discipline. IOLERO also evaluated the disciplinary outcomes associated with those violations. In one instance, IOLERO concluded that the level of discipline appropriately reflected mitigating institutional responsibility; in another, it concluded that discipline imposed for safety check violations was appropriate given the employees' understanding of existing guidance and institutional practice. [44]

IOLERO also made prospective recommendations concerning disciplinary accountability, including recommending strengthened disciplinary penalties for repeated or intentional violations of safety check requirements.[45] Although this recommendation addressed the disciplinary framework prospectively rather than recommending a particular sanction for an individual employee, it demonstrates that IOLERO exercised substantive judgment concerning discipline in connection with its independent investigative work.

The review did not identify evidence that IOLERO routinely recommended specific sanctions such as suspension, demotion, or termination. However, Measure P authorizes discipline recommendations "as appropriate" for personnel who are the subject of IOLERO investigations and does not require a particular form of disciplinary recommendation in every investigation. Given the limited number of qualifying independent investigations completed during the review period, the absence of routine recommendations for specific sanctions does not, standing alone, demonstrate an implementation gap.

[44] IOLERO, *FY 2024-25 Annual Report*, at 64-65.
[45] IOLERO, *FY 2024-25 Annual Report*, at 62-63, 65.

Accordingly, the review concludes that this authority was substantially implemented. IOLERO demonstrated its ability to evaluate disciplinary outcomes and make discipline related recommendations in connection with independent investigations. However, the limited number of qualifying investigations and specific disciplinary recommendations during the review period provides a relatively small basis from which to assess how consistently IOLERO exercises this authority.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects Measure P

The Operational Agreement is consistent with IOLERO's authority to review investigations, evaluate findings, and issue recommendations arising from audits and investigations. The agreement establishes procedures through which IOLERO may provide advice and recommendations to the Sheriff’s Office through an individual case specific audit report. The agreement also authorizes the IOLERO director to identify incomplete, biased, or otherwise deficient investigations and recommend additional investigation or propose independent recommendations or determinations regarding investigations.[46]

The Operational Agreement does not expressly identify discipline recommendations as a separate category of recommendation. However, its broad authorization for IOLERO to provide advice and recommendations does not limit or condition the discipline recommendation authority established by Measure P. The agreement separately recognizes that IOLERO may not impose discipline, preserving the distinction between IOLERO's advisory authority and the Sheriff's Office's responsibility for disciplinary decisions.[47] Accordingly, the Operational Agreement reflects the authority established by §2-394(b)(4) without materially narrowing its scope.

2. Letters of Agreement

Classification: Reflects and Expands Upon Measure P

The Letters of Agreement expressly recognize IOLERO's authority to make discipline recommendations following an independent investigation. The agreements provide that, following completion of an independent investigation, the IOLERO Director may issue a supplemental case specific report to the Sheriff’s Office that may include recommendations regarding discipline, training, policy, or procedure.[48] The agreement further establishes procedures governing the form and confidentiality of that report. These provisions reflect and operationalize the discipline recommendation authority established by §2-394(b)(4).

[46] Operational Agreement § D.1(i).
[47] Operational Agreement § D.1(i).
[48] Letters of Agreement §§ IV(C)(ii), IV(D)(iv).

§2-394(b)(5) Review, Audit, Investigation, and Access Authorities

Measure P Authority

Section 2-394(b)(5) authorizes IOLERO, as part of its review, audit, and analysis responsibilities, to review investigative evidence, review prior complaints and disciplinary history, review body worn camera and other recordings, contact witnesses and evidence custodians, request additional investigation, conduct independent investigations, issue findings and recommendations, and subpoena records or testimony.

These authorities collectively provide the investigative and auditing tools necessary for IOLERO to independently evaluate Sheriff's Office investigations and accountability processes.

Approach to Analysis

Unlike prior sections of this report, §2-394(b)(5) is evaluated on an authority by authority basis. This approach was adopted because the subsection grants a series of distinct operational authorities that serve as the primary mechanisms through which IOLERO conducts audits, investigations, and oversight activities. While previous sections focused primarily on whether a responsibility was performed, implementation of §2-394(b)(5) depends not only on whether the authority is exercised, but also on the manner and extent to which IOLERO can access the information necessary to exercise that authority.

Accordingly, each authority is evaluated through three lenses:

1. Whether IOLERO is meaningfully exercising the authority granted by Measure P.
2. Whether IOLERO receives access sufficient to exercise the authority effectively.
3. Whether the Operational Agreement and Letters of Agreement reflect, expand upon, narrow, or create or contribute to ambiguity regarding the authority granted by Measure P.

Access Classifications

In addition to evaluating implementation, each authority was assessed based on the degree of access available to IOLERO to effectively exercise the authority contemplated by Measure P. Access classifications are defined as follows:

1. **Unrestricted Access:** The review found that IOLERO receives direct or independent access to the information necessary to effectively exercise the authority contemplated by Measure P.
2. **Generally Sufficient Access:** The review found that IOLERO generally receives the information necessary to effectively exercise the authority. However, access is primarily provided through established production, coordination, or information-sharing processes rather than direct or independent access.
3. **Limited Access:** The review found that IOLERO receives some of the information necessary to exercise the authority, but limitations regarding the scope, timing,

completeness, or independence of access materially affect the office's ability to fully exercise the authority contemplated by Measure P.

4. **Insufficient Access:** The review found little or no evidence that IOLERO receives the information necessary to effectively exercise the authority contemplated by Measure P.

This approach allows the review to distinguish between situations where an authority is being exercised successfully and situations where questions remain regarding the scope, timing, completeness, or independence of access necessary to fully implement the authority.

§2-394(b)(5)(i) Access and Review of Investigative Evidence

Measure P Implementation

Classification: Substantially Implemented

The review found evidence that IOLERO has exercised its authority to review investigative evidence as part of its audit and investigative functions. Publicly available audits, independent investigations, annual reports, and stakeholder interviews demonstrate that review of investigative evidence is a core component of IOLERO's oversight process. However, the practical exercise of that authority depends upon the extent of access available to the office to independently obtain and verify investigative information.

The review further found that IOLERO's audit methodology depends heavily upon evaluation of investigative evidence to determine whether investigative findings are supported by the available facts, applicable law, policy requirements, and professional standards. As discussed in the Access Assessment below, existing production processes generally permit IOLERO to conduct case specific review, but do not necessarily permit IOLERO to independently verify the completeness of the information available for review. Stakeholders expressed differing views regarding the practical significance of those limitations.

Accordingly, the review concludes that this authority has been substantially implemented. IOLERO routinely reviews investigative evidence and relies upon that review as a core component of its audit and investigative methodology. However, the manner in which investigative evidence is made available affects IOLERO's ability to independently verify the completeness of the information provided. These limitations are addressed separately in the Access Assessment below.

Access Assessment

Classification: Limited Access

The review found that IOLERO generally receives the investigative evidence sufficient to conduct individual case audits. However, access is primarily case specific and request based rather than contemporaneous. IOLERO generally receives access to individual AIM case files after completion of the Sheriff's Office investigation, while evidence that is unavailable in AIM or maintained in separate systems, including Axon, requires additional requests to Sheriff's

Office personnel. IOLERO staff reported recurring instances in which evidence referenced in investigative reports was not available in AIM when an audit began and had to be located or uploaded by Sheriff's Office personnel. One auditor estimated that this occurs in as many as half of the cases they review.

These limitations are more consequential when IOLERO requires contemporaneous access to investigative evidence. In one independent investigation described during the review, IOLERO had access to open Sheriff's Office investigative files in AIM, but the files contained no exhibits because investigative evidence was being maintained elsewhere and was expected to be uploaded upon completion of the Sheriff's Office investigation. As a result, IOLERO lacked contemporaneous access to, and knowledge of, evidence potentially relevant to its independent investigation.

The review also identified differing perspectives among IOLERO staff regarding the practical impact of existing access limitations. Some auditors indicated that they generally receive sufficient information to perform case specific audits and reach conclusions regarding investigative quality, evidentiary sufficiency, and allegation classifications. Other personnel noted that, while existing processes generally provide the information needed to complete individual audits, the absence of unfettered access is inconsistent with nationally recognized civilian oversight principles. NACOLE identifies unrestricted access to records, personnel, and other information necessary to conduct oversight as a foundational principle of effective civilian oversight. These personnel expressed greater concern regarding the ability to independently verify the completeness of information provided, validate audit populations, conduct broader trend analysis, or perform more comprehensive performance audit oriented reviews.

The review did not identify a consensus view regarding whether existing access limitations materially affect the quality of individual audits. Rather, the differing perspectives appear to reflect variations in auditing approaches, expectations, and views regarding the level of independent verification necessary for effective oversight.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects and Narrows Measure P

The Operational Agreement reflects IOLERO's authority to access and review investigative evidence and establishes procedures through which investigative files are provided to the office for review. The agreement incorporates the access authorized by the operative provisions of the County Code, addresses direct access to Sheriff's Office information, and establishes procedures for providing information maintained in systems to which IOLERO cannot obtain direct access. For example, the agreement provides that IOLERO will be advised once a case is complete and ready for audit and will be provided a digital copy of the investigation. [49]

[49] Operational Agreement § D(3)(a)-(c).

Although these provisions appear to contemplate Sheriff's Office production of information as a mechanism for circumstances in which direct access is unavailable, the Access Assessment above demonstrates that request based production functions in practice as a principal means through which IOLERO obtains investigative information. This distinction is significant because the resulting access model places IOLERO in substantial reliance on the Sheriff's Office to identify, collect, and make information available for oversight. To the extent the Operational Agreement conditions access on these production processes rather than providing IOLERO with independent access to the information contemplated by Measure P, it narrows the practical exercise of the authority established by Measure P.

The review recognizes that providing IOLERO with direct or unfettered access to Sheriff's Office information systems raises legitimate considerations regarding access to confidential criminal justice information, including information subject to California Law Enforcement Telecommunications System (CLETS) requirements. These considerations may affect the manner in which access can lawfully and appropriately be provided and therefore provide important context for evaluating the existing access framework. As discussed in the CLETS section below, however, other California civilian oversight agencies have developed agreements or legal frameworks permitting access to confidential information while maintaining appropriate confidentiality protections.

2. Letters of Agreement

Classification: Reflects, Narrows, and Creates or Contributes Ambiguity to Measure P

The Letters of Agreement recognize IOLERO's authority to review investigative evidence involving represented employees and establish procedures governing access to investigative materials. These provisions provide different forms of access depending on the status of the Sheriff's Office investigation and the information being sought.

During an active Sheriff's Office investigation, the IOLERO Director may request access to investigative records for purposes of monitoring the investigative process. Once the Sheriff's Office issues its final disposition, IOLERO is granted access to the contemplated investigative file through AIM, which is to include reference to all evidence considered in the investigation. Qualified IOLERO staff may also search all completed complaint and administrative investigations in AIM. For information used in an investigation that is maintained in a system IOLERO cannot directly access, the Letters of Agreement require that the information be attached to the investigative file in AIM, unless IOLERO is prohibited by law from obtaining it.[50]

These provisions reflect IOLERO's investigative access authority but also condition how and when the authority may be exercised. In particular, access during an active Sheriff's Office investigation is structured as a request for investigative records for monitoring purposes, while access to the completed investigative file occurs after Sheriff's Office issues its final disposition. Although the Letters of Agreement separately authorize qualified IOLERO staff to search completed investigations in AIM and require certain information maintained in inaccessible

[50] Letters of Agreement §§ IV(A)(ii), IV(A)(v), (v)-(vii).

systems to be attached to the AIM file, these provisions do not provide the same contemporaneous and independent access to the underlying information systems contemplated by Measure P. Accordingly, the Letters of Agreement narrow the practical exercise of IOLERO's access authority by making significant aspects of access dependent upon the status of the Sheriff's Office investigation and the mechanisms through which information is made available.

The provisions also create or contribute to ambiguity regarding the scope of IOLERO's access. The authority to search all completed investigations in AIM suggests broader access than the case specific review process described elsewhere in the Letters of Agreement, while the requirement that information from inaccessible systems be attached to AIM presumes that some information will remain outside IOLERO's direct system access. Read together, these provisions leave uncertainty regarding the extent to which IOLERO is intended to have independent access to investigative information as opposed to access through records identified, maintained, or produced through Sheriff's Office processes. This ambiguity is significant because, as discussed in the Access Assessment above, the latter model predominates in practice.

Stakeholder interviews revealed continuing disagreement regarding whether the agreements merely implement Measure P or limit authorities otherwise granted by the ordinance. Some stakeholders interpreted the agreements as establishing reasonable administrative procedures to facilitate access, while others viewed them as imposing substantive constraints that affect IOLERO's ability to independently obtain and verify information, including whether access must occur through Sheriff's Office production processes rather than through direct retrieval or independent system access. NACOLE's *Access to Information* principle provides relevant professional context for evaluating these differing perspectives, recognizing that effective oversight requires timely, independent access to the information necessary to fulfill an oversight agency's responsibilities while maintaining appropriate safeguards for confidential information. From this perspective, procedures governing access should facilitate rather than materially limit an oversight agency's ability to independently carry out its authorized responsibilities.

§2-394(b)(5)(ii) Review of Prior Complaints and Disciplinary History

Measure P Implementation

Classification: Partially Implemented

Measure P provides that IOLERO shall directly receive all prior complaints involving the deputy, previous investigation files (including Brady investigations), and the record of discipline for each complaint. The review found evidence that this authority has been exercised in limited circumstances. However, the review did not find evidence that prior complaint histories, previous investigation files, Brady material, and disciplinary records are routinely received, requested, or incorporated into IOLERO's audit methodology as a standardized component of its oversight activities.

The publicly available audits reviewed during this assessment primarily evaluate the adequacy of the Sheriff's Office investigation, the evidence developed in the underlying case, applicable policy, and the appropriateness of investigative findings. The review did not identify examples in which audits expressly relied upon prior complaint history, previous investigation files, or disciplinary history in evaluating investigative outcomes or accountability determinations.

IOLERO staff expressed differing perspectives regarding implementation of this authority. One staff member was not aware of IOLERO routinely receiving prior complaint files, previous investigation files, or disciplinary records during audits and expressed uncertainty regarding whether such information had been requested or whether Measure P contemplates direct access through AIM. Another staff member indicated that the Sheriff's Office has consistently responded to IOLERO's requests for information and has cooperated with audits, except in limited circumstances involving unavailable records. However, that observation addressed the Sheriff's responsiveness to information requests generally and did not establish that the categories of historical information identified in §2-394(b)(5)(ii) are routinely requested or provided as part of the audit process.

Taken together, the review found that this authority has been exercised only in part. Although IOLERO has the ability to consider historical information when available, the review found insufficient evidence that prior complaint and disciplinary information is routinely incorporated into audits or investigations or that a consistent methodology exists for determining when such information should be considered. Accordingly, the review concludes that §2-394(b)(5)(ii) is partially implemented.

Access Assessment

Classification: Limited Access

The review found that IOLERO's access to prior complaint and disciplinary information is limited by the manner in which historical information is made available. Although IOLERO has access to certain completed investigations through AIM, the review did not identify evidence that prior complaint histories, previous investigative files, and disciplinary records are routinely provided with the investigative files subject to audit. Access to additional historical information may therefore require IOLERO to identify the need for the information and request it from the Sheriff's Office. Measure P contemplates direct receipt of this information, but the review identified differing understandings regarding how that authority is intended to operate in practice.

This access structure limits IOLERO's ability to independently and systematically review an employee's prior complaint and disciplinary history as contemplated by Measure P. As discussed in §2-394(b)(5)(i), IOLERO's access to Sheriff's Office information is principally case specific, and information maintained outside the records available through AIM is generally obtained through request based processes. Accordingly, the review concludes that IOLERO has limited access to the historical information necessary to fully exercise this authority.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects and Creates or Contributes Ambiguity to Measure P

The Operational Agreement recognizes IOLERO's authority to access historical investigative information and provides a mechanism through which completed citizen complaint and administrative investigations may be reviewed. This framework reflects IOLERO's authority under Measure P to consider prior complaints and disciplinary history when conducting oversight. [51]

The Operational Agreement provides that IOLERO staff may search completed citizen complaint investigations and completed administrative investigations within AIM.[52] On its face, this provision appears consistent with Measure P by providing a mechanism through which historical complaint information may be accessed.

However, the review found limited evidence that this authority is routinely exercised. Neither the publicly available audits nor stakeholder interviews demonstrated that auditors regularly search historical complaint information or routinely receive prior complaint and disciplinary records during audits. As a result, it remains unclear whether the AIM search authority functions as an operational practice or simply establishes an available mechanism that is infrequently used.

2. Letters of Agreement

Classification: Reflects, Narrows, and Creates or Contributes Ambiguity to Measure P

The Letters of Agreement reflect IOLERO's authority to review historical complaint information but establish different mechanisms for obtaining that information. The agreement provides that qualified IOLERO staff may search all completed Sheriff's Office citizen complaint and administrative investigations in AIM, while a different section establishes a request and production process for obtaining prior complaint information involving a specific employee.[53]

The coexistence of these provisions creates or contributes to ambiguity regarding the intended method and scope of IOLERO's access to historical complaint information. One provision appears to authorize direct searches of completed investigations, while the other contemplates requesting records from the Sheriff's Office. Moreover, neither provision establishes that IOLERO will receive an employee's complete complaint and disciplinary history as part of the investigative file under review. To the extent access to historical information not independently available through AIM depends upon a request to and production by the Sheriff's Office, the

[51] Operational Agreement § D.3(a)-(c).
[52] Letters of Agreement §§ IV(A)(vi), IV(B)(i).
[53] Letters of Agreement §§ IV(A)(vi), IV(B)(i).

Letters of Agreement narrow the practical exercise of the broader access authority established by Measure P.

Recommendation #4: Clarify and Standardize the Process for Accessing and Utilizing Prior Complaint and Disciplinary Information

The County, IOLERO, and the Sheriff's Office should clarify how the access provisions contained in Measure P, the Operational Agreement, and the Letters of Agreement are intended to operate with respect to prior complaints, previous investigation files, Brady investigations, and disciplinary history. This clarification should identify what historical information IOLERO may access independently, what information should routinely accompany investigative files provided to IOLERO, when additional information must be requested from the Sheriff's Office, and how IOLERO can verify that the historical information available is complete.

Once these expectations are established, IOLERO should develop written procedures describing when historical complaint and disciplinary information should be requested, reviewed, and documented during audits and independent investigations. The procedures should distinguish between use of historical information relevant to an individual case and broader use of historical information for pattern identification, trend analysis, and systemic oversight.

§2-394(b)(5)(iii) Review of Body Worn Camera and Other Recordings

Measure P Implementation

Classification: Substantially Implemented

The review found evidence that IOLERO has exercised its authority to review body worn camera footage, recorded interviews, dispatch recordings, surveillance footage, photographs, and other audiovisual evidence consistent with the intent of Measure P. Review of audiovisual evidence appears to be a standard component of IOLERO's audit methodology and is regularly incorporated into evaluations of investigative quality, evidentiary sufficiency, allegation classifications, and policy compliance.

Measure P also expressly authorizes IOLERO to post body worn camera videos including uses of force on its website, subject to applicable law, victim privacy rights, and active investigative considerations. The review found that IOLERO has generally elected not to independently post body worn camera footage or other publicly disclosable recordings. Instead, the office typically directs members of the public to the Sheriff's Office website, where recordings released pursuant to applicable law are maintained and made publicly available. This approach provides a mechanism for public access to released recordings, but differs from the specific authority authorized by Measure P. Because Measure P authorizes, rather than requires, IOLERO to post such recordings, the office's decision not to maintain a separate repository does not itself establish an implementation deficiency. However, the review found limited evidence that IOLERO has exercised this component of the authority during the review period.

Accordingly, the review concludes that §2-394(b)(5)(iii) has been substantially implemented. Review of audiovisual evidence is a routine component of IOLERO's audit and investigative methodology. While the office has elected not to exercise Measure P's authority to post qualifying body worn camera videos on its own website, the ordinance authorizes rather than requires such posting. As discussed in the Access Assessment below, limitations in the manner in which recordings are generally provided through established production processes rather than direct access to evidence management systems. Additional refinement of the current access model would materially improve IOLERO's ability to independently verify the completeness of audiovisual evidence available for review.

Access Assessment

Classification: Generally Sufficient Access

Although IOLERO generally receives access to recordings necessary to perform individual audits and investigations, the access model differs from Measure P's express authorization for IOLERO to "directly access and review all body worn camera videos." IOLERO does not directly access the Sheriff's Office evidence management system in which body worn camera recordings are maintained; instead, recordings must be separately requested and provided through Sheriff's Office processes.

The review did not identify significant disagreement regarding IOLERO's ability to view recordings that have been provided as part of investigative files. However, some stakeholders questioned whether the absence of direct access affects IOLERO's ability to independently determine whether all relevant recordings have been identified and produced.

Accordingly, the review concludes that IOLERO generally receives sufficient access to exercise this authority effectively. However, the absence of direct or independent access limits the office's ability to independently verify that all relevant recordings have been identified and produced. As discussed in §2-394(e), this issue reflects the broader access model rather than a limitation unique to audiovisual evidence.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects Measure P

The Operational Agreement reflects Measure P by establishing a framework for IOLERO to access and review recordings and audiovisual evidence in connection with its oversight functions. IOLERO may access relevant recordings, subject to applicable confidentiality and legal restrictions, and requires that all handling, storage, and dissemination comply with established security and privacy standards.[54]

[54] Operational Agreement §§ D.3(a)-(c).

Upon completion of a Commission on Peace Officer Standards and Training (POST) certified background check, IOLERO staff are granted access to Sheriff's Office information to the extent permitted by law, including the ability to review completed citizen complaint and administrative investigations for independent examination. The Sheriff is required to cooperate fully with IOLERO by providing direct access to Sheriff's Office information, subject to legal limitations, thereby supporting timely and effective oversight. When access is limited, those limitations must be documented in the investigative file within AIM, and if information is maintained in systems not directly accessible to IOLERO, the Sheriff's Office must provide the information, consistent with applicable legal restrictions.

Read together, these provisions are generally consistent with Measure P's authorization for IOLERO to directly access and review body worn camera videos. The Operational Agreement establishes direct access as the governing principle while providing an alternative production mechanism where IOLERO cannot obtain direct access to a particular database. The agreement does not itself appear to impose a restriction specific to IOLERO's direct access to body worn camera recordings. Accordingly, the review found that the Operational Agreement generally reflects the access authority established by Measure P.

The Operational Agreement does not separately address IOLERO's authority under §2-394(b)(5)(iii) to post qualifying body-worn-camera videos on its website.

2. Letters of Agreement

Classification: Narrows Measure P

The Letters of Agreement reflect IOLERO's authority to review body worn camera recordings associated with investigations involving represented employees. However, the Letters of Agreement create a structure that limits the direct access Measure P provides to IOLERO to a case by case basis access. Measure P expressly authorizes IOLERO to “directly access and review all body worn camera videos,” while the Letters of Agreement structure access through completed investigative files in AIM and Sheriff’s Office production processes for information maintained in systems IOLERO cannot directly access. [55] To the extent body worn camera recordings are maintained in a separate evidence system and must be provided through those processes, the Letters of Agreement narrow the practical exercise of the direct access authority by Measure P.

[55] Letters of Agreement § IV(A)(v) (providing that, following the Sheriff's Office's final disposition, IOLERO is notified that the investigation is complete and granted access through AIM to the completed investigative file, including reference to all evidence considered in the investigation, thereby structuring access on a case specific, post-investigation basis rather than providing direct or contemporaneous access to investigative materials).
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§2-394(b)(5)(iv) & (v) Contact with Witnesses and Evidence Custodians

Measure P Implementation

Classification: Substantially Implemented

Section 2-394(b)(5)(iv) and (v) authorize IOLERO to contact witnesses and evidence custodians as part of its review, audit, and investigative responsibilities.

The review found evidence that IOLERO has exercised these authorities, particularly in connection with independent investigations and supplemental fact gathering. The authority provides an important mechanism through which IOLERO may verify information, clarify investigative findings, obtain additional context, and develop evidence independent of Sheriff's Office investigations when circumstances warrant.

Stakeholder interviews generally support the conclusion that IOLERO is able to contact witnesses and evidence custodians when necessary to perform its oversight responsibilities, although the manner in which that authority is exercised varies depending upon the type of review and the circumstances of the case.

Accordingly, the review concludes that these authorities have been substantially implemented. IOLERO exercises its authority to contact witnesses and evidence custodians when necessary to perform audits, investigations, and supplemental fact gathering. However, because the practical exercise of these authorities depends upon the nature of the oversight activity and established information sharing processes, additional refinement of existing procedures would materially improve IOLERO's ability to consistently exercise the authorities contemplated by Measure P.

Access Assessment

Classification: Generally Sufficient Access

The review found that IOLERO generally has the ability to contact witnesses and evidence custodians. The frequency with which this authority is exercised appears to vary depending upon the type of oversight activity being performed. For example, independent investigations are more likely to involve direct witness contact than audits of completed internal affairs investigations, where relevant witness statements have often already been collected and reviewed.

Interviews with IOLERO reflected differing experiences regarding access to witnesses and evidence custodians. Some auditors indicated they had not needed to contact evidence custodians directly in the course of their work and therefore had not encountered significant access issues, while other auditors described access as more controlled and generally dependent upon specific requests. These differing experiences suggest that information is generally made available when requested, although the manner in which it is obtained varies depending upon the circumstances.

The review also identified at least one instance in which an attempt to directly contact a records custodian was not permitted by the Sheriff's Office. Because the legal issues arising from that matter were excluded from the approved scope of work, the review does not evaluate the legal merits of the dispute. Nevertheless, the example illustrates that the practical exercise of this authority may depend on the circumstances of the request and the procedures used to obtain information.

Accordingly, the review concludes that IOLERO generally receives sufficient access to exercise these authorities. Although access to witnesses and evidence custodians may occur through established coordination and production processes rather than direct or contemporaneous access, the review found that IOLERO is generally able to obtain the information necessary to perform its oversight responsibilities.

Authority Alignment Analysis

1. Operational Agreement

Classification: Silent on Measure P Authority

The Operational Agreement is largely silent on IOLERO's authority to communicate with witnesses and evidence custodians in connection with authorized oversight activities. The procedures in the "Custodian / Records Maintenance" section are primarily concerned with IOLERO's retention of files and the disclosure of personnel records rather than the exercise of witness contact authority.[56]

2. Letters of Agreement

Classification: Reflects Measure P

The Letters of Agreement recognize IOLERO's authority to conduct oversight activities involving represented employees while also establishing procedural requirements governing interviews, participation, representation rights, investigative processes, and the handling of confidential information. The agreements also address the subsequent disclosure of records providing that IOLERO, in consultation with County Counsel, will redact records in accordance with applicable law before public release, reflecting the parties' agreement regarding the protection of confidential information while carrying out IOLERO's public reporting responsibilities.[57] Although this does not govern IOLERO's authority to contact witnesses or evidence custodians, it establishes requirements concerning how information obtained through IOLERO's oversight activities is ultimately presented to the public and is discussed further in the observation below.

Unit members, including supervisors of employees who are the subject of an investigation under review, may be directly contacted by IOLERO as part of its efforts to ensure the completeness

[56] Operational Agreement § D.4.
[57] Letters of Agreement § IV(F)(ii).

and fairness of the Sheriff's investigation.[58] These provisions reflect an effort to balance IOLERO's oversight authority with employee representation rights and established investigative protocols.

These provisions preserve IOLERO's authority to contact witnesses and evidence custodians while applying procedural safeguards, coordination requirements, and labor related conditions that reflect the practical realities of working with unionized employees and build out the procedural framework governing how that authority is exercised.

Observation: Transparency on Redaction Practices on Publicly Available Reports

As noted above, the Letters of Agreement require IOLERO, in consultation with County Counsel, to redact records in accordance with applicable law before public release. While this provision establishes a process for ensuring that legally protected information is withheld, it does not address whether or how the basis for significant redactions should be communicated to the public. The review identified instances in publicly available records where substantial portions of documents, including entire pages, were redacted without accompanying explanations identifying the basis for the withholding. In several instances, the underlying incidents had already been publicly disclosed through the Sheriff's Office's release of records pursuant to Senate Bill 1421 and Senate Bill 16, including body worn camera footage and related investigative materials. While many redactions are legally required and serve important privacy, personnel, investigative, or legal interests, the absence of explanatory notations may limit public understanding of the scope and significance of the omitted information.

In several records reviewed, extensive redactions were apparent but the legal basis was not readily identifiable from the face of the document. For example, in the Jason Anglero-Wyrick audit, entire sections and at least one full page were redacted without explanation. Similarly, in the Ryan Pritel audit, two findings related to body worn camera issues were fully redacted without identifying the basis for the withholding. As a result, readers may be unable to determine why the information was redacted.

The review did not identify evidence that redactions were improper. Rather, the issue is one of transparency. Because portions of the underlying incidents had already been publicly disclosed, brief explanatory notations describing the general basis for the remaining redactions could assist readers in understanding why additional information was withheld.

Recommendation #5: Provide Explanatory Notations for Significant Public Redactions

Where substantial portions of publicly released reports, investigative reports, audits, or supporting records are withheld, IOLERO should consider providing a brief notation identifying the general basis for the redaction when legally permissible. Examples may include personnel

[58] Letters of Agreement § IV(A)(viii).

confidentiality, protected investigative information, attorney-client privilege, pending litigation, privacy protections, or other applicable statutory exemptions.

Providing this context would improve transparency without requiring disclosure of protected information. It would assist members of the public in understanding the nature of withheld material, the reasons for the redaction, and the limitations of the publicly available record while remaining consistent with applicable confidentiality requirements.

This practice would better align public reporting with the Yellow Book encourages. Auditors to clearly communicate the scope of their work and any significant limitations affecting the audit so that readers can appropriately interpret the findings.[59] It would also be consistent with the principles reflected in the California Public Records Act, which requires agencies withholding records or portions of records to identify the applicable legal basis for nondisclosure.[60] Although IOLERO's public reports are not public records responses, providing a brief explanation of significant redactions would similarly promote transparency by helping readers understand the nature of withheld information and the limitations of the publicly available record while preserving confidentiality where required by law.

§2-394(b)(5)(vi) Requests for Supplemental Investigation

Measure P Implementation

Classification: Fully Implemented

Section 2-394(b)(5)(vi) authorizes IOLERO to request supplemental investigation when it determines that a Sheriff's Office investigation is incomplete, deficient, or otherwise requires additional inquiry.

The review found evidence that IOLERO has exercised this authority consistent with the intent of Measure P. As discussed throughout this report, publicly available audits demonstrate that IOLERO has requested supplemental investigative work when auditors concluded that additional analysis, evidence, or investigative steps were necessary before reaching or validating investigative findings. Examples include requests for additional investigative analysis, witness interviews, policy evaluation, supervisory review, and evidentiary development in the Nathan Smart, Ryan Uhl, Donald Miller, Jason Anglero-Wyrick, and Roberto Perez Hildebrand audits.

Requests for supplemental investigation function as an important quality assurance mechanism through which IOLERO identifies investigative deficiencies and seeks additional investigative work necessary to strengthen investigative quality and support a reliable assessment of the investigation.

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[59] Yellow Book §§ 8.03-8.07 (requiring audit reports to communicate information fairly, completely, and objectively so that users can understand the scope of the work performed and any significant limitations affecting the audit) and §§ 9.08-9.10 (requiring auditors to obtain sufficient, appropriate evidence and consider the effect of evidence limitations on audit findings and conclusions).
[60] Cal. Gov't Code §§ 7922.000, 7922.525, 7922.540 (West 2026).

Accordingly, the review concludes that this authority has been exercised consistent with the intent of Measure P. Opportunities identified elsewhere in this report regarding audit methodology and evidentiary analysis are intended to strengthen the effectiveness of supplemental investigation requests rather than address implementation gaps.

Access Assessment

Classification: N/A

Unlike several other authorities evaluated under § 2-394(b)(5), this provision does not primarily concern access to records, information, or investigative systems. Rather, it concerns IOLERO's authority to identify investigative deficiencies and request supplemental investigation based on the information available for review. Accordingly, an access assessment is not applicable to this provision.

The review did not identify evidence that IOLERO is prevented from identifying investigative deficiencies or requesting supplemental investigation when appropriate. Stakeholders generally viewed this authority as an important quality assurance mechanism that enables IOLERO to address evidentiary gaps, request additional investigative steps, and improve the overall quality and completeness of Sheriff's Office investigations.

The review also identified differing perspectives regarding the threshold for determining when supplemental investigation is warranted. As discussed later in this report, the review identified an opportunity for IOLERO to further distinguish between investigative deficiencies that warrant additional investigative work and those that do not materially affect the evidentiary basis for an investigative finding. The review further found that questions regarding whether supplemental investigation requests are accepted, implemented, or otherwise incorporated into Sheriff's Office investigations concern the effectiveness of the collaborative review process rather than IOLERO's ability to exercise this authority.

Because this review relied primarily on publicly available audits and investigative materials, it was able to evaluate the Sheriff's Office's responses to supplemental investigation requests only in matters subject to public disclosure. Accordingly, the review cannot determine whether the publicly available cases are representative of all supplemental investigation requests made during the review period.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects and Expands Upon Measure P

The Operational Agreement reflects IOLERO's authority to request additional investigation and expands upon Measure P by establishing formal procedures through which IOLERO may communicate investigative concerns, identify deficiencies, request additional investigative activity, and receive responses from the Sheriff's Office. The IOLERO Director may further advise if an investigation appears to be incomplete, biased, or otherwise deficient, and may recommend further review or propose independent recommendations or determinations regarding investigations. The provision also permits such recommendations to be made public on a summary level in the annual report, provided that no personally identifying information is included.[61]

2. Letters of Agreement

Classification: Reflects and Expands Upon Measure P

The Letters of Agreement expressly recognize IOLERO's authority to identify investigative deficiencies and recommend additional investigative activity arising from audits, reviews, and independent investigations. When the IOLERO Director concludes that a Sheriff's Office investigation was incomplete, biased, or otherwise deficient, the case specific report shall identify the bases and reasons for that conclusion.[62] This provision supplements Measure P by establishing a documentation requirement governing the exercise of IOLERO's authority.

The review did not identify provisions that materially restrict IOLERO's ability to identify investigative deficiencies or recommend additional investigation.

Observation: Recurring Themes Identified in Audits

As discussed throughout this report, publicly available audits identified recurring themes involving incomplete witness interviews, insufficient policy analysis, limited documented reasoning supporting investigative findings, and investigative steps that IOLERO concluded required additional development before findings could be reliably supported.[63] Similar issues were identified across multiple publicly available audits, suggesting that these concerns were not isolated to individual investigations and providing a foundation for identifying for organizational trends and tracking whether similar investigative issues continue to arise over time.

Several publicly available audits included written Sheriff's Office responses addressing IOLERO's preliminary findings and recommendations. Those responses offer important context regarding areas of agreement, disagreement, and implementation. However, interviews with IOLERO staff indicated that written responses are not routinely provided and that in many instances, preliminary audits become final without a formal written response from the Sheriff's Office. Because only a subset of audits and investigative files were publicly available during this review, the review could evaluate Sheriff's Office responses only for those matters subject to public disclosure. Accordingly, the review could not determine whether the publicly available responses were representative of all audits conducted during the review period.

[61] Operational Agreement § D.1(i).
[62] Letters of Agreement § IV(C)(ii).
[63] See, e.g., *Nathan Smart Officer-Involved Shooting Audit*; *Ryan Uhl Use of Force Audit*; *Donald Miller In-custody Death Audit*; *Roberto Perez Hildebrand Canine Deployment Audit*; *Jason Anglero-Wyrick Audit*.

Recommendation #6: Identify and Track Recurring Audit Findings with the Goal of Improving Sheriff's Office Investigations

The review recommends that IOLERO develop a formal process for identifying recurring findings across audits and investigations and expressly noting when a deficiency has been identified in prior reports.

When an audit identifies a concern that has been raised previously, IOLERO should consider citing the earlier report, summarizing the prior recommendation, and assessing whether the issue has been fully addressed, partially addressed, or remains unresolved. This approach would help distinguish isolated case specific issues from broader organizational patterns affecting investigative quality, accountability, and policy compliance.

This approach is consistent with practices used by other government oversight entities. For example, in its audit of Los Angeles Unified School District's (LAUSD) contract with Gold Star Foods, Inc., the LAUSD Office of Inspector General identified potential systemic concerns by referencing prior audit reports in which similar issues had previously been identified.[64] Rather than treating each audit finding as an isolated occurrence, the report used prior findings to assess whether the issue reflected a recurring organizational challenge requiring broader management attention. This approach provides decision makers with additional context regarding whether a finding represents an isolated event or evidence of a persistent systemic issue.

Observation: Distinguish Investigative Sufficiency from Opportunities for Improvement

The review identified several audits in which IOLERO concluded that an investigation was incomplete because one or more investigative steps were omitted, including interviews of involved deputies or additional policy analysis. For example, in the Ryan Uhl and Nathan Smart audits, IOLERO concluded that the investigations were incomplete because the involved deputies were not interviewed during the administrative review process. Similarly, in the Donald Miller and Roberto Perez Hildebrand audits, IOLERO identified additional investigative or analytical steps that it concluded should have been completed before reaching the Sheriff's Office's findings.

IOLERO's definition of an "Incomplete" investigation has changed during the review period. From 2022-24, it was defined as "meaning IOLERO believed that the investigation was not thorough enough to justify reaching a conclusion yet, such as cases in which additional evidence could have been gathered, or better articulation of the rationale for the finding should have been

[64] Los Angeles Unified Sch. Dist. Off. of the Inspector Gen., *Gold Star Foods, Inc. - Audit of Contract No. 4400007783*(CA 25-1469), https://media.edlio.net/594f6250/914625ed/b81d59d8/ab02d34db4994240a5486f215d5ee055?_=CA%2025-1469%20Gold%20Star%20Foods%20Inc.%20-%20Contract%20No.%204400007783.pdf (last visited June 22, 2026).

memorialized.[65] In FY 2024-25 it was defined more broadly as “all allegations were insufficiently investigated.”[66]

The review found that the deficiencies falling within this definition may vary in significance. Some may materially affect the evidentiary basis for the Sheriff's Office's findings, while others may identify opportunities to strengthen investigative practices without undermining the reliability of the ultimate investigative conclusion.

Measure P authorizes IOLERO to identify investigative deficiencies and recommend improvements to Sheriff's Office policies, procedures, practices, and training. Observations that do not materially affect the reliability of an individual investigation may therefore have value as opportunities for improving investigative practices across future investigations. Clearly communicating the significance of identified deficiencies would assist the Sheriff's Office in prioritizing corrective actions and reinforce the role of oversight as a tool for continuous improvement.

Recommendation #7: Differentiate Investigative Sufficiency from Opportunities for Improvement

The review recommends that IOLERO further refine its audit and independent investigation methodology by more explicitly documenting how identified investigative deficiencies affect its evaluation of the Sheriff’s Office findings. When deficiencies are identified, reports should distinguish between those that represent opportunities to improve investigative quality and those that could materially affect IOLERO’s ability to conclude that an investigative finding is adequately supported by the available evidence and analysis.

Where investigative deficiencies do not materially affect the reliability of the Sheriff's Office's findings but nevertheless identify opportunities to improve investigative practices, IOLERO should consider emphasizing those observations through policy, procedural, supervisory, or training recommendations. As staffing capacity and workload permit, recurring observations identified across multiple audits may also be synthesized into broader organizational recommendations to support continuous improvement.

This approach is consistent with the Yellow Book, which provides that audit findings should present the information necessary to satisfy the audit objectives and, to the extent practicable, explain the criteria, condition, cause, and effect of identified deficiencies so that readers understand the significance of the findings and the need for corrective action.[67] It is also consistent with oversight methodologies used by other inspector general offices. For example, the City of Oakland Inspector General utilizes graduated assessment categories that distinguish among varying levels of compliance and evidentiary support rather than relying solely on binary determinations.[68] Although developed for compliance inspections rather than misconduct

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[65] IOLERO, *FY 2022-23 Annual Report*, at 10; IOLERO, *FY 2023-24 Annual Report*, at 25.
[66] IOLERO, *FY 2024-25 Annual Report*, at 17.
[67] Yellow Book §§ 8.56-8.58 (developing audit findings using the elements of criteria, condition, cause, and effect).
[68] City of Oakland Off. of the Inspector Gen., *Compliance Inspection Policy* § VII (Compliance Determinations), adopted pursuant to Oakland Mun. Code §§ 2.45.010-2.45.230; City of Oakland Off. of the Inspector

investigations, the framework demonstrates how more nuanced assessment categories can better communicate the significance of identified deficiencies, improve transparency, and help readers understand the basis for oversight conclusions.

§2-394(b)(5)(vii) & (viii) Independent Investigations

Measure P Implementation

Classification: Substantially Implemented

Section 2-394(b)(5)(vii) and (viii) authorize IOLERO to conduct independent investigations and issue findings and recommendations arising from those investigations.

The review found that IOLERO has made significant progress implementing Measure P's independent investigative authority during the review period. During the review period, the annual reports document the development of IOLERO's independent investigative program from its initial implementation through multiple investigations involving deputy involved and in-custody deaths. In FY 2022-23, IOLERO reported beginning independent investigations for the first time, although none had yet been completed. By FY 2023-24, IOLERO reported multiple independent investigations underway, including a deputy involved shooting and several in-custody deaths. The FY 2024-25 Annual Report documents the completion of independent investigative reviews involving in-custody deaths at the MADF and continued development of its investigative program through the independent investigation of the David Peláez Chávez deputy involved shooting.[69]

The completed in-custody death reviews demonstrate that IOLERO has moved beyond solely auditing Sheriff's Office investigations by independently evaluating critical incidents and issuing its own findings and recommendations. According to the FY 2024-25 Annual Report, IOLERO independently reviewed detention records, investigative materials, housing decisions, access to medical and mental health care, safety checks, and compliance with applicable policies and constitutional standards. These reviews demonstrate that IOLERO has exercised its authority to conduct independent reviews and issue its own findings and recommendations. However, the available record indicates these reviews primarily involved independent evaluation of existing investigative materials provided by the Sheriff's Office rather than the creation of a wholly independent evidentiary record through witness interviews, scene examinations, or other original investigative activities.

Although completed after the close of the review period, the publicly available David Peláez Chávez investigation provides useful context regarding the continued development of IOLERO's independent investigative model. Unlike the completed independent reviews described above, the Peláez Chavez investigation documents IOLERO's use of investigative interviews conducted

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Gen., *Negotiated Settlement Agreement Task 3 Compliance Inspection* (Final Report), https://www.oaklandca.gov/files/assets/city/v/2/inspector-general/documents/published-reports/nsa-task-3-compliance-inspection-final-copy.pdf (last visited July 11, 2026).

[69] IOLERO, *FY 2022-23 Annual Report*, at 3,6-7; IOLERO, *FY 2023-24 Annual Report,* at 7-8, 42-46; IOLERO, *FY 2024-25 Annual Report*, at 1, 10-11, 64-67; IOLERO.

under its newly developed subpoena procedures, independent factual analysis, and development of its own evidentiary record.[70] The investigation therefore illustrates the distinction between independently reviewing an existing investigative record and conducting an investigation through which IOLERO develops its own evidence.

Accordingly, the review concludes that this authority is substantially implemented. Over the review period, IOLERO progressed from initiating independent investigative reviews to its first independent investigation. This demonstrates IOLERO's ability to independently evaluate critical incidents, and issued independent findings and recommendations. However, the completed investigations available for evaluation during the review period evidence primarily reflects independent review of existing investigative records rather than the development of wholly independent evidentiary records. Continued refinement of investigative procedures and access to investigative information would improve the office's ability to fully exercise the independent investigative authority contemplated by Measure P.

Access Assessment

Classification: Limited Access

The review found evidence that IOLERO receives access to information necessary to conduct independent investigations. However, the office does not possess direct or independent access to all investigative information, and stakeholder interviews reflected differing perspectives regarding whether existing access fully supports the independent investigative authority contemplated by Measure P.

Stakeholder interviews reflected differing perspectives regarding the practical impact of existing access limitations. Some stakeholders indicated that existing access mechanisms provide sufficient information to conduct meaningful independent investigations. The review did not identify evidence that the Sheriff's Office intentionally withheld information from IOLERO in the matters examined as part of this assessment. However, other stakeholders expressed concern that reliance on Sheriff's Office production processes limits IOLERO's ability to independently verify that all relevant information has been identified and produced.

The review did not identify evidence that these issues prevented IOLERO from conducting independent investigations during the review period. However, the questions raised are consistent with broader discussions regarding direct access, independent verification of investigative records, historical personnel information, and differing interpretations of access authorities under Measure P, the Operational Agreement, and the Letters of Agreement. These issues are discussed further in the analysis of §2-394(e).

[70] *David Peláez Chávez Independent Investigation and Audit*, https://sonomacounty.gov/Main%20County%20Site/Administrative%20Support%20%26%20Fiscal%20Services/IOLERO/Documents/Audit%20Reports/IOLERO%20Final%20Report%20-tagged.pdf (last visited August 16, 2026).

Accordingly, the review concludes that IOLERO's access is limited for purposes of exercising these authorities. Although existing access mechanisms generally permit the office to conduct meaningful independent investigations, reliance on information produced through Sheriff's Office processes limits IOLERO's ability to independently verify the completeness of investigative information and develop a fully independent evidentiary record in every case.

Authority Alignment Analysis

1. Operational Agreement

Classification: Silent on Measure P Authority

The Operational Agreement does not contain provisions specifically addressing IOLERO's authority to conduct independent investigations. As a result, the agreement neither expands nor narrows the authority as set forth in Measure P.

2. Letters of Agreement

Classification: Reflects and Narrows Measure P

The Letters of Agreement recognize IOLERO's authority to conduct independent investigations involving represented employees and largely mirror the language of Measure P. However, the Letters of Agreement introduce additional procedural requirements and timelines that affect how and when this authority may be exercised.

Specifically, the Letters of Agreement provide that for incomplete or otherwise deficient Sheriff's Office investigations, IOLERO's independent investigation shall not commence until after the Sheriff's Office refers the matter to IOLERO.[71] For incidents involving a death in-custody or resulting from the actions of Sheriff's Office personnel, the Letters of Agreement further require that IOLERO's independent investigation begin no sooner than 90 days following the District Attorney's receipt of the completed criminal investigation or communication of a charging decision, whichever occurs first. In all cases, IOLERO's investigation shall not begin prior to the commencement of the Sheriff's Office administrative investigation.[72]

The Letters of Agreement also establish parameters governing IOLERO's interaction with witnesses and custodians of evidence, including provisions related to contacting bargaining unit members during business hours when possible and clarifying that IOLERO does not have authority to direct the activities of represented employees.[73] Additionally, the Letters of Agreement contemplate the use of subpoenas for testimony or documents as necessary and provide the IOLERO Director discretion to issue supplemental case specific reports to the

[71] Letters of Agreement § IV(D)(i)(a).
[72] Letters of Agreement § IV(D)(i)(b).
[73] Letters of Agreement § IV(D)(iii)(a).

Sheriff's Office, including discipline recommendations based on IOLERO's independent investigation.[74]

While these provisions do not eliminate IOLERO's authority to conduct independent investigations, they narrow the practical exercise of that authority by imposing procedural sequencing, timing requirements, and labor related safeguards that are not expressly described in Measure P.

Observation: Not All Independent Investigations are Publicly Releasable

The review found evidence that IOLERO has exercised its independent investigation authority in significant and high profile matters. Information obtained during the review indicated that, during the review period, IOLERO completed two independent investigative reviews of in-custody deaths and initiated an independent investigation into an officer involved shooting.

Because the underlying records associated with IOLERO's two completed in-custody death reviews were not publicly releasable under appliable confidentiality requirements, the reviews were not available for direct examination as part of this assessment. Instead, the review relied on the detailed summaries contained in IOLERO's FY 2024-25 Annual Report. Those summaries identify the scope of each review, the evidence examined, the issues evaluated, and the resulting findings and recommendations. They demonstrate that IOLERO independently assessed detention records, investigative materials, housing decisions, access to medical and mental health care, safety checks, constitutional considerations, and compliance with applicable policies before issuing its own conclusions. While the summaries are not a substitute for reviewing the complete investigative files, they provide sufficient detail to conclude that IOLERO actively exercised its independent investigative authority during the review period.

The review also found that the annual report summaries represent a reasonable balance between California's confidentiality requirements governing law enforcement personnel matters and the public's interest in understanding IOLERO's oversight activities. Although the underlying investigations remain confidential, the summaries provide meaningful insight into the nature of the issues reviewed, the analytical framework employed, and the recommendations issued. This approach advances transparency to the extent permitted by law while preserving the confidentiality of protected investigative records.

§2-394(b)(5)(ix) Subpoena Authority

Measure P Authority

Section 2-394(b)(5)(ix) authorizes IOLERO to issue subpoenas for records, testimony, and other information necessary to perform its oversight responsibilities.

[74] Letters of Agreement § IV(D)(iii)(b), (iv).

Measure P Implementation

Classification: Outside the Scope of Review

This provision was excluded from the approved scope of review at the outset of the engagement because its implementation was the subject of pending litigation at that time. Accordingly, no conclusions are offered regarding its implementation or effectiveness.

Overall Measure P Implementation Classification for § 2-394(b)(5)

Classification: Substantially Implemented

The review found substantial evidence that IOLERO has implemented the core review, audit, investigative, and oversight authorities established by § 2-394(b)(5). Throughout the review period, IOLERO routinely exercised its authority to review investigative evidence, evaluate body worn camera and other recordings, request supplemental investigation, contact witnesses and evidence custodians when appropriate, and conduct independent investigative reviews consistent with the intent of Measure P. Publicly available audits, annual reports, investigative reports, and stakeholder interviews collectively demonstrate that these authorities have become integral components of IOLERO's oversight methodology.

The review also identified several areas where implementation could be further strengthened. Access to investigative evidence, prior complaint and disciplinary information, and certain categories of investigative records remains dependent upon established production and coordination processes rather than direct or independent access. In addition, the review found opportunities to further standardize the use of historical complaint information, strengthen the communication of recurring audit themes, and more clearly distinguish investigative deficiencies that materially affect investigative sufficiency from those that primarily identify opportunities for organizational improvement. These observations do not reflect a failure to exercise the authorities granted by Measure P but rather opportunities to further enhance the consistency, transparency, and effectiveness of IOLERO's audit and investigative methodology.

Accordingly, the review concludes that the authorities evaluated under § 2-394(b)(5) are substantially implemented. IOLERO has established and routinely exercises the principal audit and investigative authorities contemplated by Measure P. While several recommendations are offered to improve methodology, access, and organizational practices, the review found that these authorities are generally being exercised consistent with the intent of the ordinance and form the foundation of IOLERO's civilian oversight program.

Overall Access Assessment Classification for §2-394(b)(5)

Classification: Mixed Access

The review found that access varies across the authorities for which access is relevant to their practical exercise. IOLERO generally receives sufficient access for certain oversight activities, including review of recordings and contact with witnesses and evidence custodians. However, the review found more significant access limitations with respect to investigative evidence, prior complaint and disciplinary information, and information necessary to conduct independent investigations. Other authorities, such as the authority to request supplemental investigations, do not independently present an access issue and therefore were not assigned an access classification. Accordingly, no single access classification accurately characterizes §2-394(b)(5) as a whole. The review therefore concludes that access is mixed across the authorities for which access was evaluated.

§2-394(b)(6) & (7) Findings, Recommendations, and Policy Improvement

Measure P Authority

Measure P authorizes IOLERO to review completed investigations, issue findings regarding the adequacy of those investigations, and make recommendations concerning policies, procedures, practices, and training intended to improve accountability and Sheriff's Office operations.

Implementation Assessment

Classification: Fully Implemented

The review found evidence that IOLERO routinely exercises its authority to issue findings and recommendations regarding policy, procedure, and training consistent with the intent of Measure P. Review of annual reports, audit reports, and supporting documentation demonstrates a consistent process for evaluating completed Sheriff's Office investigations, identifying deficiencies, communicating areas of disagreement, and recommending organizational improvements.

IOLERO's annual reports provide measurable evidence of this activity. In FY 2022-2023, IOLERO audited 27 administrative investigations conducted by the Sheriff's Office. Of those cases, IOLERO found 21 investigations complete (78%) and identified deficiencies in 6 investigations (22%). IOLERO reported agreement with the Sheriff's Office's substantive findings in approximately 70% of reviewed cases. [75] In FY 2023-2024, IOLERO audited 48 administrative investigations, finding 32 complete (66%) and identifying deficiencies in 17 investigations (34%).[76] IOLERO agreed with the Sheriff's Office's substantive conclusions in 32 cases (66%) and disagreed in 16 cases (33%), including two cases in which IOLERO disagreed entirely with the Sheriff's findings.[77] In FY 2024-25, IOLERO completed 33 audits, finding 24 investigations complete (~73%) and 9 investigations incomplete or partially incomplete (27%).

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[75] IOLERO, *FY 2022-23 Annual Report*, at 19.

[76] IOLERO, *FY 2023-24 Annual Report*, at 46. The Annual Report states that IOLERO audited 48 administrative investigations, finding 32 investigations complete and identifying deficiencies in 17 investigations. The reported figures total 49 rather than 48; this report presents the figures as reported by IOLERO.

[77] IOLERO, *FY 2023-24 Annual Report*, at 46, 49.

IOLERO agreed with the Sheriff's Office substantive conclusions in 28 of the 33 audited cases (85%).[78]

The audit reports reviewed during this assessment demonstrate that IOLERO's findings extend beyond procedural review and frequently evaluate investigative thoroughness, witness interviews, evidence collection, policy compliance, legal analysis, and disciplinary considerations. Where deficiencies are identified, IOLERO routinely documents the basis for disagreement and recommends corrective action.

The annual reports further demonstrate that IOLERO uses individual case findings to identify broader organizational issues and opportunities for improvement. Across the review period, recommendation topics included Internal Affairs investigative practices, use of force investigations, canine deployment policies, detention facility operations, PREA compliance, body worn camera activation, jail video preservation, social media conduct, dispatch procedures, telephone access for detainees, and staff training requirements. These recommendations reflect a systematic effort to translate audit observations into policy and operational improvements.[79]

Importantly, the review identified evidence that recommendations have resulted in tangible organizational changes. The Sheriff's Office responses to annual reports document multiple policy revisions, procedural changes, and training enhancements that were implemented in response to IOLERO recommendations. Examples include revisions to canine policies, conflict of interest procedures for Internal Affairs investigations, detention facility search procedures, telephone access and signage practices, body worn camera guidance, preservation of jail video evidence, and complaint handling procedures. While the Sheriff's Office does not adopt every recommendation, the documented responses demonstrate that IOLERO's recommendations are reviewed, considered, and frequently incorporated into agency operations.

Recent annual reports demonstrate a developing feedback process through formal written responses from the Sheriff's Office and written replies from IOLERO explaining areas of agreement and disagreement. This practice is consistent with The Yellow Book, which encourage auditors to obtain and evaluate management comments, consider whether those comments warrant revisions to audit findings, and present both management's views and the auditor's evaluation in the final report.[80] The inclusion of this exchange demonstrates that audit findings and recommendations are being used as part of an ongoing dialogue regarding investigative quality, accountability, and organizational improvement.

Although the review did not identify a centralized tracking system that publicly reports implementation status for all recommendations, the available evidence demonstrates that IOLERO consistently exercises its authority to issue findings and recommendations and that those recommendations have influenced policy, procedural, training, and operational changes

[78] IOLERO, *FY 2024-25 Annual Report*, at 17-18.
[79] IOLERO, *FY 2022-23 Annual Report*, at 20-27; IOLERO, *FY 2023-24 Annual Report*, at 20-30; IOLERO, *FY 2024-25* at 19-22.
[80] Yellow Book §§ 9.33-9.35 (addressing management comments, auditor evaluation of those comments, and presentation in the final report).

within the Sheriff's Office. Accordingly, the review concludes that the authorities contained in §2-394(b)(6) and §2-394(b)(7) are fully implemented.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects Measure P

Measure P authorizes IOLERO to assess and make recommendations regarding policies, procedures, strategies, training, and practices and to advise when investigations appear incomplete, biased, or otherwise deficient. Measure P further authorizes IOLERO to recommend further review and propose independent recommendations or determinations regarding investigations. §2-394(b)(6)-(7).

The Operational Agreement largely mirrors this authority. Specifically, providing that at the conclusion of each case audit, IOLERO may provide advice and recommendations to the Sheriff's Office through a case specific audit report. The agreement also authorizes the IOLERO Director to advise when an investigation appears incomplete, biased, or otherwise deficient and to recommend further review or issue independent recommendations or determinations regarding investigations.[81] The Operational Agreement further establishes a process through which the Sheriff's Office may review and respond to preliminary audits, after which IOLERO considers those comments before issuing a final audit report.[82]

Unlike other Measure P authorities, the Operational Agreement does not materially narrow IOLERO's ability to make findings or recommendations. Rather, it operationalizes Measure P by establishing procedures through which findings and recommendations are communicated, reviewed, and finalized.

2. Letters of Agreement

Classification: Reflects Measure P

The Letters of Agreement similarly recognize IOLERO's authority to review investigations, identify deficiencies, and issue recommendations arising from audits and investigations. The Letters of Agreement expressly acknowledge IOLERO's authority to review, audit, and analyze Sheriff's Office investigations pursuant to Measure P and provide procedures governing how findings and recommendations are communicated.

Following completion of a review, the Letters of Agreement provide that the IOLERO Director may provide advice and recommendations to the Sheriff's Office through a case specific report. The agreements further provide that, where IOLERO concludes an investigation was incomplete, biased, or otherwise deficient, the report shall identify the basis for that conclusion and may

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[81] Operational Agreement § D.1(i).
[82] Operational Agreement § D.1(j).

notify the Sheriff of IOLERO's intent to conduct an independent investigation. The agreements also authorize IOLERO to issue supplemental reports following independent investigations, including discipline recommendations where appropriate.[83]

As with the Operational Agreement, the review did not identify provisions within the Letters of Agreement that materially narrow IOLERO's authority to issue findings, identify deficiencies, or make recommendations. Instead, the Letters of Agreement provide procedural mechanisms for documenting findings, communicating recommendations, and initiating additional review where IOLERO concludes an investigation is incomplete or deficient.

Observation: Alignment of Investigative Standards

Earlier publicly available audits reflected instances in which IOLERO evaluated Sheriff's Office investigations using interpretations of statutory standards that differed from the language contained in Sheriff's Office policy. During the review period, however, both organizations appear to have moved toward greater alignment. The Sheriff's Office's Internal Affairs investigations now routinely identify and apply applicable statutory and departmental authorities, while IOLERO's more recent annual reports reflect increased agreement regarding investigative outcomes and collaborative development of shared investigative expectations through the Completeness Checklist.

Although questions regarding the interpretation of law and policy will inevitably arise in administrative investigations, the review found evidence that the Sheriff's Office and IOLERO have made meaningful progress toward applying a common analytical framework when evaluating investigations.

Observation: Continued Development of Audit Methodology

Stakeholder interviews identified opportunities to further standardize audit methodology, documentation practices, and quality assurance processes. Although outside the formal review period, IOLERO has begun implementing more structured audit expectations and evaluation criteria intended to improve consistency across reviewers and strengthen the overall quality of oversight activities. As IOLERO's audit methodology continues to mature, documenting internal quality management practices, including standardized audit guidance, supervisory review procedures, and periodic calibration among auditors, would help institutionalize these improvements and promote continued consistency across audits and investigations. These practices are consistent with the quality management and supervisory principles reflected in The Yellow Book, which encourage audit organizations to establish policies and procedures that promote consistent application of professional judgment and reasonable assurance that audit work is performed in accordance with applicable standards.[84]

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[83] Letters of Agreement §§ IV(C)(ii), IV(D)(iii)(b), IV(D)(iv).

[84] Yellow Book §§ 3.79-3.82 (Quality Management and Supervision).

Observation: Individual Audits Have Demonstrated the Capacity to Drive Organizational Improvement

The review found that IOLERO's oversight activities have, in several instances, produced meaningful organizational improvements extending beyond the resolution of individual complaints. Rather than limiting its work to evaluating case specific investigations, IOLERO has successfully translated recurring observations from multiple audits into broader policy and operational improvements.

The Sheriff's Office's revisions to its canine deployment policy illustrate this progression. Concerns identified through multiple canine deployment audits regarding policy interpretation, proportionality, and decision making were synthesized into broader policy recommendations that ultimately contributed to revisions of the Sheriff's Office's canine policy. Similarly, recommendations issued through annual reports have resulted in documented changes to body-worn camera guidance, detention facility procedures, conflict of interest practices, telephone access, jail video preservation, and other operational policies.

These examples demonstrate that IOLERO's recommendations have the potential to influence organizational practices well beyond the individual cases from which they originate. They also illustrate that the office's value extends beyond identifying deficiencies by contributing to continuous organizational learning and improvement.

Observation: Recommendation Tracking and Feedback Mechanisms

The review found that IOLERO provides transparency regarding its recommendations through its annual reports, which summarize key findings, identify areas for improvement, and include formal responses from the Sheriff’s Office. These reports serve as an important public facing mechanism for communicating oversight activity and documenting areas of agreement and disagreement between IOLERO and the Sheriff’s Office.

However, the review found limited evidence of a formal mechanism for communicating the status of recommendations throughout the year. In practice, IOLERO often learns whether recommendations have been accepted, rejected, or implemented through the Sheriff’s annual response to the IOLERO annual report and periodic responses to individual audits. Because responses are not consistently provided for every recommendation, it may be difficult to determine the disposition of all recommendations issued during a review period.

As a result, both organizations may miss opportunities to discuss recommendations while they are still being developed, clarify implementation challenges, identify recommendations that have already been adopted, and refine future recommendations based on operational feedback. Additionally, while the annual report provides an important level of transparency, it does not provide a comprehensive, real time accounting of the status of all recommendations, which may limit the public’s ability to fully assess progress over time.

Recommendation #8: Develop a Centralized Recommendation Tracking and Response Process

The Sheriff's Office and IOLERO should consider further developing IOLERO's internal database to support recommendation tracking, implementation monitoring, and public reporting. The database could serve as the central repository for documenting recommendation status, Sheriff's Office responses, implementation progress, and recurring organizational themes over time. Information appropriate for public release could then be incorporated into periodic reports or other public reporting mechanisms, consistent with applicable confidentiality requirements.

Such a process could identify each recommendation issued by IOLERO, document the Sheriff's Office response, indicate whether the recommendation has been accepted, partially implemented, implemented, or declined, and provide periodic updates regarding implementation progress. The purpose is to create a structured feedback process that promotes ongoing communication between IOLERO and the Sheriff's Office regarding proposed improvements while providing the public with clearer information about the disposition and implementation of recommendations.

A centralized recommendation tracker would provide several benefits. It would allow IOLERO to better assess the effectiveness of its recommendations, provide auditors with timely feedback on whether recommendations are practical and useful, and help identify opportunities to refine recommendations before similar issues arise in future audits. It would also allow the Sheriff's Office to document corrective actions as they occur rather than relying primarily on annual reporting cycles.

This approach is consistent with practices used by civilian oversight organizations in California, many of which supplement annual reporting with separate, ongoing tracking of recommendation status. For example, the Los Angeles County Sheriff's Department provides periodic updates to the Civilian Oversight Commission identifying recommendations and actions taken in response.[85] The City of San Jose Independent Police Auditor has a public facing dashboard that is updated quarterly. The database summarizes every recommendation the Independent Police Auditor has provided since 1993, departmental responses, and implementation status since.[86] Similarly, the Oakland Inspector General incorporates recommendation tracking into its audit and compliance monitoring processes, including follow up assessments of departmental responses and progress toward implementation over time.[87]

The centralized recommendation tracking process should complement the structured case coordination process described in Recommendation #3 by documenting the Sheriff's Office's

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[85] Los Angeles County Sheriff's Department, *Letter to COC on Recommendations Regarding Deputy Gangs, Subgroups, and Cliques*, https://lasd.org/wp-content/uploads/2026/05/Transparency_Oversight_Letter_to_COC_on_Recommendations_Regarding_Deputy_Gangs_Subgroups_and_Cliques.pdf (last visited June 23, 2026).

[86] City of San José Office of the Independent Police Auditor, *IPA Recommendations*, https://www.sanjoseca.gov/your-government/appointees/independent-police-auditor/ipa-recommendations (last visited June 23, 2026).

[87] City of Oakland Office of the Inspector General, *Negotiated Settlement Agreement Task 3 Compliance Inspection* (Final Report), https://www.oaklandca.gov/files/assets/city/v/2/inspector-general/documents/published-reports/nsa-task-3-compliance-inspection-final-copy.pdf (last visited June 23, 2026).

response to recommendations following the parties' post-investigation discussions, including whether recommendations were accepted, modified, declined, or implemented, together with any subsequent implementation actions.

§2-394(b)(8) Track, Analyze and Advise on Legislative Actions and Law Enforcement Audit Trends

Measure P Authority

Measure P requires IOLERO to monitor and analyze legislative developments and law enforcement audit trends and, when appropriate, advise the County on legislative issues and recommend legislative platforms.

Measure P Implementation

Classification: **Substantially Implemented**

The review found evidence that IOLERO tracks and analyzes law enforcement oversight audit trends through annual reporting, audit analysis, and public presentations. However, the review did not find evidence that IOLERO routinely advises the County regarding legislative actions or legislative platforms.

IOLERO's annual reports demonstrate ongoing trend analysis regarding complaints, investigations, audit outcomes, use of force incidents, detention facility issues, policy concerns, and recurring areas of disagreement between IOLERO and the Sheriff's Office. For example, annual reports identify recurring audit themes involving use of force investigations, body worn camera compliance, canine deployments, detention facility operations, PREA compliance, investigative completeness, social media conduct, and training issues. The reports also provide statistical summaries regarding investigations reviewed, audit outcomes, and complaint classifications. These activities are consistent with the authority to track and analyze law enforcement audit trends.

The review did not identify evidence that IOLERO routinely advises the County regarding legislative actions or recommends legislative platforms during the review period. However, this is an authority exercised at the IOLERO Director's discretion. Stakeholder interviews indicated that legislative advocacy has not historically been a significant component of IOLERO's operations and that the office has generally focused its efforts on complaint review, auditing, investigations, policy recommendations, community engagement, and organizational accountability.

Further, the review found that this authority extends beyond individual case review by directing IOLERO to track, analyze, and advise regarding legislative actions and law enforcement audit trends. As discussed above, IOLERO routinely exercises the trend analysis component of this authority through its audits, investigations, annual reports, and other public reporting. The review also identified that IOLERO has, on occasion, exercised this authority through broader organizational analyses beyond individual cases. Although these efforts demonstrate the office's capacity to conduct this type of review, they have not yet become a routine component of IOLERO's oversight activities. While Measure P does not prescribe a particular methodology for exercising this authority, performance audits and other organizational reviews represent one approach for further developing this function over time. This approach is also consistent with NACOLE's Principle of *Policy and Pattern Analysis*.

Accordingly, the review concludes that §2-394(b)(8) is substantially implemented. IOLERO routinely exercise the law enforcement trend analysis component of this authority. However, the review did not identify evidence that IOLERO exercised its authority to advise the County regarding legislative actions or recommend legislative platforms during the review period. Broader organizational analyses have been conducted only on a limited basis. Continued refinement of these functions would materially improve IOLERO's ability to fully exercise the authority contemplated by Measure P.

Authority Alignment Analysis

1. Operational Agreement

Classification: Silent on Measure P Authority

The Operational Agreement does not contain provisions specifically addressing IOLERO's authority to track legislative actions, advise the County regarding legislative platforms, or analyze broader law enforcement audit trends. The agreement primarily focuses on complaint review, auditing, investigations, access to information, and related oversight processes. As a result, the Operational Agreement neither expands nor narrows the authority established by Measure P.

2. Letters of Agreement

Classification: Silent on Measure P Authority

The Letters of Agreement do not contain provisions specifically addressing legislative monitoring, legislative recommendations, or broader law enforcement trend analysis. The agreements primarily address investigative review, independent investigations, access to information, labor considerations, and audit procedures. Accordingly, the Letters of Agreement neither expand nor narrow the authority granted by Measure P.

§2-394(b)(9) Annual Reports and Ad Hoc Reports

Measure P Authority

Section 2-394(b)(9) authorizes IOLERO to prepare an annual report to the Board of Supervisors that includes statistical information, analysis of trends, and policy and procedure recommendations. The section further authorizes the Director to prepare ad hoc reports as deemed appropriate.

Measure P Implementation

Classification: Fully Implemented

The review found evidence that IOLERO routinely exercises its authority to prepare annual reports consistent with the intent of Measure P. During the review period, IOLERO issued annual reports containing statistical summaries, trend analysis, audit results, policy recommendations, implementation updates, and summaries of oversight activities. The reports documented audit outcomes, areas of agreement and disagreement between IOLERO and the Sheriff's Office, complaint and investigation trends, and recurring policy issues identified through audits and investigations.

The annual reports also demonstrate IOLERO's ability to synthesize observations across multiple investigations and identify broader organizational issues. Rather than reporting solely on individual cases, the reports identify recurring patterns, discuss systemic concerns, and communicate recommendations to the Board of Supervisors, the Sheriff's Office, and the public.

The review found less evidence regarding the separate authority to prepare ad hoc reports. However, this is an authority exercised at the IOLERO Director's discretion. Although IOLERO routinely issues audit reports and annual reports, interviews suggest that these reports have generally been viewed as distinct from the ad hoc reporting authority described in Measure P. When asked about the provision, IOLERO leadership indicated that the intended scope of the ad hoc report authority is not well defined. The review did not identify evidence that IOLERO lacks the authority or ability to prepare ad hoc reports when circumstances warrant. Rather, the review found that IOLERO relied on annual reports, audit reports, and other existing reporting mechanisms have been sufficient to communicate its oversight activities. Given the discretionary nature of the ad hoc reporting authority, the absence of a standalone ad hoc report does not, by itself, demonstrate an implementation deficiency.

The review did identify references to CAC ad hoc committees that have developed recommendations and issue focused work products on topics such as canine policy and community engagement. However, CAC activities were excluded from the scope of this review and were not independently evaluated.

Accordingly, the review concludes that §2-394(b)(9) is fully implemented. IOLERO routinely exercises the annual reporting authority established by Measure P, while the authority to prepare ad hoc reports remains discretionary and has not been routinely exercised. The revie did not identify the absence of standalone ad hoc reports as an implementation deficiency.

Authority Alignment Analysis

1. Operational Agreement

Classification: Silent on Measure P Authority

The Operational Agreement does not contain provisions specifically addressing IOLERO's authority to prepare annual reports or ad hoc reports under §2-294(b)(9). The agreement primarily addresses complaint review, auditing, investigations, access to information, and coordination between IOLERO and the Sheriff's Office. Accordingly, the Operational Agreement neither expands nor narrows the reporting authority established by Measure P.

1. Letters of Agreement

Classification: Silent on Measure P Authority

The Letters of Agreement similarly do not contain provisions addressing IOLERO's authority to prepare annual reports or ad hoc reports under §2-394(b)(9). The agreements focus on investigative review, independent investigations, access to information, and labor related implementation issues. Accordingly, the Letters of Agreement neither expand nor narrow the reporting authority granted by Measure P.

Observation: Annual Reporting as the Primary Reporting Mechanism

The review found that annual reporting has become one of IOLERO's most mature and consistently exercised functions and provides substantial information to the public. The annual reports provide transparency regarding oversight activities, audit outcomes, policy recommendations, and systemic issues identified through the review process. During the review period, IOLERO's audit function also represented one of its most significant and resource intensive responsibilities. While those audits can influence individual investigations and lead to policy and operational improvements, much of that work occurs outside of public view because it involves confidential personnel investigations and other protected records. As a result, the annual report serves as a primary mechanism through which the public gains insight into IOLERO's activities and the outcomes of its audit work.

The review found that IOLERO's annual reporting practices are consistent with NACOLE's Principle of *Public Reporting and Transparency*. This principle recognizes that regular public reporting promotes accountability by informing the community of oversight activities, communicating organizational findings and recommendations, and strengthening public confidence in civilian oversight.

§2-394(b)(10) Community Outreach

Measure P Authority

Section 2-394(b)(10) authorizes IOLERO to conduct outreach to the community, including schools, community based organizations, business and civic groups. The provision contemplates activities such as facilitating communication between the community and law enforcement, educating the public regarding law enforcement practices and policies, gathering community feedback, handling media relations concerning matters within IOLERO's scope of duties, and supporting broader public engagement efforts.

Measure P Implementation

Classification: Outside the Scope of Review

IOLERO's community outreach activities were excluded from the approved scope of work for this review. Accordingly, no conclusions are offered regarding the implementation or effectiveness of the office's community outreach program. Although the review team interviewed the staff member responsible for community outreach to better understand IOLERO's organizational structure and responsibilities, those discussions were not used to evaluate the implementation or assess the effectiveness of the office's outreach activities.

§2-394(b)(11) Community Advisory Council

Measure P Authority

Section 2-394(b)(11) authorizes IOLERO to staff and support monthly meetings of the CAC and provides that the CAC shall serve as a bridge between law enforcement, IOLERO, and the communities of Sonoma County. Measure P further provides that IOLERO and the CAC shall function as independent bodies working in a cooperative and collaborative manner.

Measure P Implementation

Classification: Outside the Scope of Review

The CAC was excluded from the approved scope of work for this review. Accordingly, no conclusions are offered regarding the implementation or effectiveness of the CAC's structure, governance, operations, or activities

§2-394(c) Limitations on Authority

Measure P Authority

Section 2-394(c) establishes limitations on IOLERO's authority and provides that IOLERO shall not have the authority to direct the activities of Sheriff's Office employees, prevent Sheriff's Office personnel from carrying out their duties and responsibilities, conduct criminal investigations, direct disciplinary actions, interfere with collective bargaining rights or employee protections established by law, or exercise powers reserved to the Sheriff under state law. These provisions establish the boundaries of civilian oversight while preserving the Sheriff's operational authority, criminal investigative responsibilities, personnel management authority, and labor obligations.

Measure P Implementation

Classification: Fully Implemented

The review did not identify evidence that IOLERO has exceeded or attempted to exceed the limitations established in §2-394(c). Interviews, annual reports, audit reports, independent investigations, and governing agreements consistently reflect an understanding that IOLERO's role is to review, audit, investigate, evaluate, and make recommendations rather than direct Sheriff's Office operations.

Throughout the review period, IOLERO exercised its authority by identifying investigative deficiencies, issuing findings, recommending additional investigation, conducting independent investigations where authorized, and making policy, procedural, training, and disciplinary recommendations. Consistent with the limitations established by §2-394(c), the review did not identify evidence that IOLERO attempted to direct Sheriff's Office employees, assume operational command authority, conduct criminal investigations, or impose disciplinary sanctions.

The review further found that IOLERO's practices consistently reflect the distinction between oversight authority and management authority contemplated by Measure P. While IOLERO routinely evaluates Sheriff's Office investigations and may disagree with investigative conclusions or recommend corrective action, operational decisions, personnel decisions, and disciplinary sanctions remain the responsibility of Sheriff's Office management.

Accordingly, the review concludes that the limitations established by §2-394(c) is fully implemented. Throughout the review period, IOLERO conducted its oversight activities within the legal and jurisdictional limitations established by Measure P.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects Measure P

The Operational Agreement reinforces the distinction between IOLERO's oversight authority and the Sheriff's operational authority. The agreement consistently frames IOLERO's role as reviewing investigations, conducting audits, identifying deficiencies, issuing findings, and making recommendations rather than directing Sheriff's Office operations.[88]

Specifically, the Operational Agreement provides that IOLERO may provide advice and recommendations to the Sheriff's Office through case specific audit reports and may advise when investigations appear incomplete, biased, or otherwise deficient. The agreement establishes a process through which the Sheriff's Office may review and respond to preliminary audit reports before IOLERO issues a final report. These provisions contemplate an advisory and oversight

[88] Operational Agreement §§ D.1(i)-(j), D.2(a)-(c).

function rather than operational control.[89] The Operational Agreement further preserves the distinction between management and oversight authority by providing mechanisms for IOLERO review and feedback without authorizing IOLERO to direct Sheriff's Office personnel, conduct criminal investigations, or impose discipline.

Accordingly, the Operational Agreement reflects and operationalizes the limitations established in §2-394(c) by maintaining a clear separation between IOLERO's oversight functions and the Sheriff's Office's operational authority.

2. Letters of Agreement

Classification: Reflects Measure P

The Letters of Agreement reinforce several of the limitations contained in §2-394(c), particularly those relating to management authority, labor relations, and direction of represented employees.

Most directly, the Letters of Agreement expressly recognize that IOLERO may not direct the activities of represented Sheriff's Office employees and preserve the Sheriff's Office's supervisory authority over its personnel.[90] This provision directly reflects the limitation contained in Measure P prohibiting IOLERO from directing Sheriff's Office personnel in the performance of their duties.

The Letters of Agreement likewise preserve disciplinary authority within established management and personnel processes. Although IOLERO may issue findings, recommendations, and supplemental reports arising from audits and independent investigations, including discipline related recommendations where appropriate, the agreements do not authorize IOLERO to impose discipline or direct disciplinary outcomes.[91] The Letters of Agreement also establish procedural protections governing interviews and interactions with represented employees that recognize collective bargaining rights and other legal protections afforded to employees, consistent with the limitations identified in§2-394(c).[92]

The provisions discussed above generally reflect limitations already recognized in §2-394(c) by preserving Sheriff's Office supervision and disciplinary authority and recognizing employee rights protected by applicable law. This classification is limited to the alignment of these provisions with the restrictions established by §2-394(c). As discussed elsewhere in this report, other provisions of the Letters of Agreement, including some procedures governing access, interviews, and independent investigations, may narrow the practical exercise of affirmative authorities granted to IOLERO under other provisions of Measure P.

[89]Operational Agreement § D.1(i).
[90] Letters of Agreement § IV(D)(iii)(a).
[91] Letters of Agreement §§ IV(C)(ii), IV(D)(iv).
[92] Letters of Agreement §§ IV(A)(viii), IV(D)(iii)(a).

§2-394(d) Written Protocols Between IOLERO and the Sheriff

Measure P Authority

Section 2-394(d) provides that IOLERO and the Sheriff shall create written protocols that further define and specify the scope and process for IOLERO's receipt, review, processing, and audit of complaints and investigations in a mutually coordinated and cooperative manner. This provision serves as an implementation mechanism, directing the parties to develop procedures governing how the oversight system established by Measure P operates in practice.

Measure P Implementation

Classification: Substantially Implemented

The review found that the written protocols contemplated by §2-394(d) have been developed and implemented through the Operational Agreement and subsequent Letters of Agreement between the County, IOLERO, the Sheriff's Office, and the applicable bargaining units.

The Operational Agreement establishes procedures governing complaint intake, complaint review, auditing, independent investigations, access to records, information sharing, reporting, and coordination between IOLERO and the Sheriff's Office. The Letters of Agreement further define procedures applicable to represented employees, including access to records, employee interviews, independent investigations, audit processes, and labor related implementation requirements. While these agreements provide the foundational framework for coordination, the review found that one of the most significant ongoing challenges between IOLERO and the Sheriff's Office involves differing interpretations of the same authorities and, in some instances, inconsistent or overlapping language across the various governing documents. These differences in interpretation have contributed to points of tension regarding how certain oversight functions should be implemented in practice.

Together, these agreements constitute the primary written protocols contemplated by §2-394(d). However, the review found that the continued refinement of operational practices under those protocols remains appropriate as the oversight system continues to develop. In its September 19, 2025, response to IOLERO's FY 2024-25 Annual Report, the Sheriff's Office proposed several procedural refinements aimed at improving coordination between the agencies, including more structured complaint intake procedures, collaborative identification of allegations before investigation, and processes designed to reduce investigative workload and audit backlogs.[93]

Specifically, the Sheriff's Office recommended that IOLERO and Internal Affairs personnel jointly review complaints to identify specific allegations and applicable policy provisions before a matter is formally investigated and suggested regular coordination meetings to discuss complaint processing and investigative scope. The Sheriff's Office also proposed procedural changes intended to improve complaint screening and referral practices, including verification of

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[93] Sheriff's Office Response to FY 2024-25 IOLERO Annual Report (Sept. 19, 2025), Attachment II to *IOLERO State of the Office Report*, Sonoma County Board of Supervisors (Oct. 21, 2025).

complaint information before referral and collaborative development of allegation identification procedures.[94]

Although these proposals were presented as operational recommendations rather than formal amendments to the governing agreements, they illustrate that the operational practices governed by §2-394(d) continue to evolve through ongoing collaboration between the Sheriff's Office and IOLERO. The review also found that IOLERO leadership has recently begun implementing additional communication practices with Internal Affairs personnel and exploring alternative approaches to complaint processing. These developments reflect the type of cooperative protocol refinement contemplated by Measure P and suggest that continued formalization of operational practices may further strengthen coordination between the agencies.

The review also identified opportunities for continued refinement of operational protocols regarding case selection, communications, and backlog management. During stakeholder interviews and in public discussions regarding IOLERO's most recent annual report, concerns were raised regarding the growing audit backlog and the challenge of providing timely oversight while new investigations continue to enter the system. The Sheriff's Office similarly expressed concern that many audits involve investigations that are several years old and, in some instances, policies, procedures, personnel, or practices that have already changed by the time the audit is completed.

The review found merit in considering how limited audit resources are allocated across pending cases. While retrospective review remains an important accountability function, the practical value of auditing individual cases may diminish when the underlying policy has been substantially revised, the employees involved are no longer employed by the Sheriff's Office, or the applicable disciplinary timeframes have expired. Conversely, older cases may continue to provide substantial value when they reveal systemic issues, recurring investigative deficiencies, organizational trends, matters of exceptional public importance, or opportunities to evaluate the effectiveness of previously implemented reforms.

Accordingly, the review concludes that the written protocols contemplated by §2-394(d) have been substantially implemented. The Operational Agreement and Letters of Agreement provide the foundational framework through which IOLERO and the Sheriff's Office coordinate implementation of Measure P and have enabled IOLERO to exercise its core oversight responsibilities. However, differing interpretations of those agreements and continued development of operational practices demonstrate that opportunities remain to improve coordinated case management, information sharing, communication, and prioritization practices.

[94] Some of the underlying process concerns discussed in this recommendation overlap with Recommendation #3. Recommendation #3 encourages earlier coordination between IOLERO and the Sheriff's Office regarding complaint intake, allegation identification, applicable policy provisions, investigative scope, and case coordination. Implementing those recommendations may reduce the need for supplemental investigative requests by identifying investigative issues earlier in the review process. This recommendation, by contrast, focuses on how IOLERO communicates the significance of identified investigative deficiencies once an audit has been completed.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects Measure P

Section 2-394(d) expressly directs IOLERO and the Sheriff to create written protocols governing implementation of Measure P. The Operational Agreement is the principal document through which that authority was exercised.

The agreement establishes detailed procedures governing complaint review, auditing, independent investigations, access to information, reporting, communication, and coordination between the parties.[95] As a result, the Operational Agreement directly implements the requirement established by §2-394(d).

2. Letters of Agreement

Classification: Expands Upon Measure P

The Letters of Agreement build upon the Operational Agreement by providing detailed procedures governing implementation of Measure P authorities involving represented employees. The Letters of Agreement address matters including access to records, employee interviews, independent investigations, communication procedures, and labor related safeguards.[96]

Although these specific procedures are not prescribed by the text of §2-394(d), the Letters of Agreement represent a further refinement of the written protocols contemplated by Measure P by establishing detailed operational procedures governing the exercise of oversight authorities. As discussed throughout this report, some of those procedures simply implement or clarify existing legal requirements, while others affect the practical exercise of particular Measure P authorities. Those authority specific impacts are evaluated in the corresponding sections of this report.

Observation: Balancing Timeliness with Organizational Impact

As discussed above, the review identified an opportunity to more systematically balance the value of retrospective review with the need to provide timely oversight and actionable recommendations when available resources are insufficient to review all pending investigations contemporaneously.

Recommendation #9: Adopt a Case Audit Prioritization Framework

The review recommends that IOLERO develop formal criteria for prioritizing audits when available resources are insufficient to review all pending matters contemporaneously. The

[95] Operational Agreement §§D.1-D.3.
[96] Letters of Agreement §§ IV(A)-IV(D).

Yellow Book and professional auditing guidance recognize that audit planning should be based upon assessments of significance and audit risk and that limited audit resources should be directed toward matters where audit work is most likely to provide meaningful organizational value.[97]

Factors that may be considered include:

- the age of the investigation;
- whether the underlying policy remains in effect;
- whether the matter presents a recurring or systemic issue;
- the significance of the alleged misconduct;
- the potential organizational impact of recommendations;
- public interest considerations;
- whether applicable disciplinary time limitations have expired; and
- whether the audit is likely to inform future policy, training, supervision, or operational practices.

Under such a framework, IOLERO could devote greater attention to recent investigations where recommendations can more promptly inform current policy, training, supervision, or operational practices, while still reserving the ability to review older matters that present systemic concerns, recurring deficiencies, organizational trends, or issues of exceptional significance.

This recommendation is not intended to limit IOLERO's discretion under Measure P or discourage review of older investigations. Rather, it is intended to provide a structured framework for exercising that discretion in a manner that maximizes the value of limited oversight resources and supports IOLERO's ability to provide timely, actionable feedback to improve Sheriff's Office operations, accountability, transparency, and public trust.

§2-394(e) Access to Records and Information

<u>Measure P Authority</u>

Section 2-394(e) requires the Sheriff-Coroner to fully cooperate with IOLERO by providing it with direct access to records and information necessary to carry out its oversight responsibilities.[98] The provision contemplates broad access to Sheriff's Office records, databases, computer applications, recordings, and physical files, including incident reports, dispatch records, personnel records, complaint investigations, Brady investigations, disciplinary records,

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[97] The Yellow Book provides that auditors should consider significance and audit risk when planning audit work and use professional judgment to establish the scope, objectives, and methodology necessary to achieve the audit objectives. Yellow Book §§ 8.03-8.07. The Institute of Internal Auditors similarly recommends that audit organizations develop risk-based audit plans that align finite audit resources with the organization's most significant risks, objectives, and opportunities for organizational improvement. Institute of Internal Auditors, *Developing a Risk-Based Internal Audit Plan* (2d ed. 2025).

[98] Throughout this report, the terms *Sheriff* and *Sheriff-Coroner* are used interchangeably to refer to the Sheriff.

jail inmate grievances, body worn camera footage, racial profiling data, and other audio and video recordings related to Sheriff's Office operations.

Unlike many provisions of Measure P that establish discrete oversight authorities, §2-394(e) functions as the primary enabling authority through which IOLERO obtains the information necessary to exercise its other statutory responsibilities. Access to these records supports IOLERO's ability to review complaints and investigations, conduct audits and independent investigations, evaluate policies, practices, and training, identify organizational trends, and issue informed findings and recommendations.

Approach to Analysis

This section is not evaluated on a subsection by subsection basis. Although §2-394(e) identifies several categories of records and information to which IOLERO is authorized to access, the review found that access to these categories generally occurs through the same operational framework described throughout this report. Rather than receiving direct or independent access to multiple Sheriff's Office systems or repositories, IOLERO typically obtains information through established production, coordination, and information sharing processes, including access to investigative materials maintained within the AIM system and other records produced by the Sheriff's Office.

Because the practical issues identified during the review relate to the overall access framework rather than materially different practices for each category of information identified in §2-394(e), the review evaluates implementation of the section as a whole. This approach avoids unnecessary repetition while permitting a comprehensive assessment of how Measure P's access provisions operate in practice.

Measure P Implementation

Classification: Partially Implemented

The review found evidence that IOLERO has exercised this authority and generally receives extensive access to Sheriff's Office investigative files, complaint records, administrative investigations, body worn camera recordings, reports, policies, and other materials necessary to perform audits and independent investigations. Stakeholders consistently acknowledged that IOLERO receives broad access to information and that access has expanded significantly since the adoption of Measure P. Generally, the review did not identify evidence of systemic refusal to provide records requested by IOLERO. To the contrary, most stakeholders described a working process through which records are routinely shared and oversight activities are conducted.

At the same time, the review identified recurring differences in interpretation regarding the scope of access contemplated by Measure P, the Operational Agreement, and the Letters of Agreement. Stakeholders differed regarding whether certain categories of information should be provided automatically, provided upon request, or remain subject to legal or procedural limitations affecting disclosure. The review found that these differing interpretations have practical consequences for implementation of §2-394(e). While IOLERO generally receives the information necessary to perform its oversight responsibilities, the manner in which information is accessed differs across the categories identified in Measure P, resulting in varying levels of practical access.

Accordingly, the review concludes that this authority has been partially implemented. IOLERO exercises its access authority through established production and information sharing processes and generally receives the information necessary to conduct its oversight responsibilities. However, because the office does not maintain direct or independent access to all categories of information made available through Sheriff's Office systems and production processes rather than independently accessing and verifying the completeness of relevant records.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects and Narrows Measure P

The Operational Agreement broadly implements the access authority contemplated by Measure P.[99] It grants IOLERO access to complaint investigations, administrative investigations, and related records necessary to perform audits and reviews.[100] The agreement also provides that IOLERO staff may search completed citizen complaint and completed administrative investigations and receive access to audio recordings, video recordings, investigative reports, and related materials.[101]

The Operational Agreement broadly implements the access authority contemplated by Measure P. It grants IOLERO access to complaint investigations, administrative investigations, and related records necessary to perform audits and reviews. The agreement also provides that IOLERO staff may search completed citizen complaint and completed administrative investigations and receive access to audio recordings, video recordings, investigative reports, and related materials. However, the agreement generally structures access to investigative materials through completed investigations, AIM, and information sharing processes administered by the Sheriff's Office rather than providing IOLERO with contemporaneous or independent access to the underlying investigative systems and repositories.

2. Letters of Agreement

Classification: Reflects and Narrows Measure P

The Letters of Agreement generally recognize IOLERO's broad access authority while imposing procedural and labor related conditions governing how certain information is accessed.

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[99] Operational Agreement § D.3.
[100] Operational Agreement § D.3.
[101] Operational Agreement §§ D.3, D.3(a).

For example, the Letters of Agreement contain provisions addressing access to completed investigations, historical complaint records, administrative investigations, personnel related information, interviews, and investigative materials.[102] In several instances, the Letters of Agreement distinguish between information that may be directly searched by IOLERO and information that must be specifically requested.

These provisions do not eliminate access to the information but affect the manner in which access occurs in practice. As a result, the Letters of Agreement generally reflect Measure P while narrowing certain aspects of implementation through procedural requirements not expressly described in the ordinance.

The review also evaluated implementation of this provision in relation to NACOLE's Principle of *Full Cooperation*. This principle recognizes that effective civilian oversight is strengthened when law enforcement agencies fully cooperate with oversight activities by providing timely access to records, information, personnel, and other assistance necessary to carry out oversight responsibilities, consistent with applicable legal protections. The review found evidence of ongoing cooperation between the Sheriff's Office and IOLERO throughout the review period. At the same time, the differing interpretations regarding the scope, timing, and method of access discussed throughout this report demonstrate opportunities to further align implementation with this principle by promoting a shared understanding of the respective responsibilities established by Measure P and the agreements implementing its provisions.

Observation: Differing Interpretations of Access and Audit Sufficiency

The review found that the principal challenge associated with §2-394(e) is not the existence of access, but differing interpretations regarding the scope and mechanics of access. These issues arose in discussions concerning both audit activities and independent investigations and frequently centered on the degree of direct access necessary for IOLERO to independently verify the completeness of investigative records.

Throughout stakeholder interviews, participants frequently agreed that IOLERO receives substantial information but disagreed regarding whether certain categories of information should be automatically available, affirmatively requested, or subject to legal restrictions. These differing interpretations were particularly evident regarding historical personnel information, certain investigative databases, notification processes, and access to information subject to separate state and federal confidentiality requirements.

The review also identified differing perspectives among IOLERO auditors regarding the practical sufficiency of existing access. Some auditors indicated that they generally receive the information necessary to perform audits and independent reviews and have not found current access limitations to materially impair their ability to evaluate Sheriff's Office investigations. Other auditors expressed concerns regarding direct access to certain categories of information, including historical complaint records, personnel related information, and records that may assist in evaluating patterns of conduct, organizational history, or investigative completeness. These

[102] Letters of Agreement §§IV(A)(vi), IV(B)(i), IV(D).

auditors generally viewed contemporaneous and direct access as important to maintaining independence and ensuring that potentially relevant information is not inadvertently omitted from review.

These differing perspectives appear to reflect not only differing interpretations regarding the mechanics of access, but also differing approaches to auditing and oversight. Some auditors place greater emphasis on evaluating whether sufficient evidence exists within the investigative record to support a conclusion, while others place greater emphasis on independently verifying the completeness of the information provided and ensuring that all potentially relevant records are available for review. Both approaches are consistent with legitimate oversight objectives and illustrate the challenges associated with translating broad access authorities into day-to-day audit practice.

The review further notes that similar differences in approach emerged in discussions regarding audit backlog management and workload prioritization. Interviews reflected ongoing internal discussions regarding whether efficiency gains should be achieved through additional staffing, modifications to audit methodology, changes to case prioritization practices, or a combination of those approaches. These discussions underscore the broader challenge of balancing comprehensive review with timely oversight and reinforce the importance of clearly defining what information is necessary to perform an effective audit.

Observation: Access to CLETS and Confidential Law Enforcement Information

CLETS is California's secure criminal justice information network that provides authorized law enforcement agencies access to sensitive information such as criminal history records, warrant information, restraining orders, stolen property records, driver's license and vehicle registration information, and other state and federal criminal justice databases. Access to CLETS and information derived from CLETS is governed by federal and state law, California Department of Justice policies, and FBI Criminal Justice Information Services (CJIS) security requirements that strictly regulate who may access, receive, and disseminate this information. As a result, questions regarding IOLERO's access involve not only Measure P, but also a separate legal framework governing confidential criminal justice information.

A central issue for civilian oversight agencies is that they are generally not recognized as CLETS agencies or authorized criminal justice users under this regulatory framework and therefore are not entitled to direct access in the same manner as law enforcement agencies. As a result, oversight entities such as IOLERO may possess broad statutory authority to review investigations while simultaneously being subject to separate legal restrictions governing access to certain categories of confidential criminal justice information.

The Sheriff's Office expressed concern that CLETS-derived information is subject to statutory, regulatory, and California Department of Justice restrictions that limit dissemination outside authorized criminal justice users. The Sheriff's Office identified these restrictions as the primary reason it does not provide IOLERO with direct, unimpeded access to certain investigative systems and information repositories, notwithstanding Measure P's broad access provisions. IOLERO staff generally viewed access questions through the broader framework of Measure P's oversight mandate and the need to independently evaluate investigative decisions and confirm the completeness of information provided for audit. The review also notes that IOLERO staff participating in this review completed POST background investigations as a condition of receiving access to certain confidential information. While those background investigations demonstrate that mechanisms exist to evaluate the suitability of oversight personnel to handle sensitive information, they do not alter the separate legal and regulatory requirements governing access to CLETS and CLETS-derived information.

The review recognizes that CLETS information is governed by a distinct legal and regulatory framework that exists independently of Measure P. California Department of Justice guidance states that civilian oversight entities are not CLETS agencies and therefore are not entitled to direct CLETS access in the same manner as criminal justice agencies.[103] At the same time, the guidance provides that local civilian oversight boards may obtain CLETS and CLETS-derived information through a validly issued subpoena or other court order and that law enforcement agencies must provide such information unless they obtain judicial relief from the subpoena or order.[104]

Accordingly, the review finds merit in the Sheriff's Office concern regarding compliance with applicable CLETS requirements. However, the review also finds that complete exclusion of IOLERO from information that materially informs investigative conclusions would be inconsistent with the oversight objectives established by Measure P. Where investigative findings, charging decisions, classification decisions, or other conclusions rely upon CLETS-derived information, there should be some lawful mechanism through which IOLERO can evaluate the factual basis for those conclusions.

The review further notes that Measure P already provides IOLERO with unusually broad access authorities, including direct access to records and information necessary to conduct audits, reviews, and investigations, as well as subpoena authority. As discussed throughout this report, many of the recurring disputes regarding access arise not from the absence of authority, but from questions regarding how those authorities interact with subsequent implementation agreements, labor protections, confidentiality requirements, and specialized legal frameworks such as CLETS. In that respect, the issue is less one of authority than one of implementation.

The review notes that this challenge is not unique to Sonoma County. Other California civilian oversight models combine broad oversight access with compulsory process authority while relying primarily on established information sharing processes to conduct day to day oversight. The Los Angeles County Sheriff Civilian Oversight Commission provides the closest comparator because it oversees a sheriff's department and works through the Office of Inspector General. Los Angeles County authorizes the Commission to obtain information, records, and testimony necessary to carry out its oversight responsibilities and permits the Commission to direct the Inspector General to issue subpoenas when necessary to compel the production of records or

[103] California Department of Justice, *CLETS Access by Civilian Oversight Entities Bulletin*; CLETS Policies, Practices and Procedures § 1.6.4(C).
[104] California Department of Justice, *CLETS Access by Civilian Oversight Entities Bulletin*; CLETS Policies, Practices and Procedures § 1.6.4(C); FBI CJIS Security Policy § 4.1.

testimony.[105] The County Code further requires County officers and employees to cooperate with the Commission and promptly provide requested documents and information to the extent permitted by law.[106]

The Los Angeles County model is instructive because it demonstrates that broad oversight access and subpoena authority are not mutually exclusive. Rather, routine oversight generally occurs through established information sharing processes, while subpoena authority remains available when disputes arise or information cannot otherwise be obtained. This structure allows the oversight body to conduct most reviews efficiently while preserving a formal mechanism for resolving disagreements regarding access.

Similar approaches exist elsewhere in California. The San Francisco Department of Police Accountability operates under Charter provisions requiring City departments to provide prompt and full cooperation, including access to records and information necessary to perform its functions.[107] Likewise, Oakland's civilian oversight framework provides the Community Police Review Agency, Police Commission, and Office of Inspector General access to police records available to Internal Affairs investigators and authorizes the Police Commission to issue subpoenas to compel testimony and the production of records when necessary.[108] These agencies possess subpoena authority, but their governing frameworks contemplate ongoing information sharing and cooperation as the primary means of facilitating oversight.

This broader approach is consistent with the California Department of Justice's CLETS guidance, which recognizes that civilian oversight entities may obtain CLETS and CLETS-derived information through valid subpoenas or court orders. The existence of that authority demonstrates that oversight review and CLETS restrictions are not inherently incompatible. The question is therefore not whether IOLERO may ever obtain CLETS-derived information, but whether Sonoma County can develop a lawful and predictable process that allows oversight review to occur without requiring routine resort to adversarial legal processes.

Recommendation #10: Develop a Controlled Access Framework for CLETS-derived Information

The review recommends that the County, Sheriff's Office, County Counsel, employee organizations, and IOLERO jointly evaluate whether a legally compliant framework can be developed for reviewing investigative decisions that rely upon CLETS-derived information.

Any framework should recognize that IOLERO is not a criminal justice agency as defined by the California Law Enforcement Telecommunications System (CLETS) and therefore should not receive unrestricted access to CLETS or other information protected by applicable state or federal law. At the same time, the framework should distinguish between information whose

[105] Los Angeles County Code §§ 3.79.040(C), 3.79.040(E).
[106] Los Angeles County Code § 3.79.060.
[107] San Francisco Charter § 4.136.
[108] Oakland Charter §§ 604(b)(3), 604(f)(1)-(2).

access is restricted because it is derived from CLETS or otherwise legally protected and investigative materials that are not subject to those restrictions.

For investigative materials that are not subject to CLETS restrictions or other legal requirements that prohibit or specifically limit direct access, such as, investigative reports, investigator summaries and analyses, body worn camera recordings, photographs, witness statements, interview recordings, policy materials, and other evidence routinely maintained as part of an administrative investigation, the County should evaluate whether IOLERO can be provided direct or independent access consistent with Measure P. The fact that information is confidential or subject to protections governing its use or disclosure does not necessarily mean that IOLERO is legally prohibited from receiving direct access. Providing direct access to these materials would reduce reliance on case by case production processes and better enable IOLERO to independently verify the completeness of investigative records while preserving appropriate safeguards for confidential information.

For investigative conclusions that rely upon CLETS-derived or information subject to legal restrictions on direct access, the framework should identify lawful mechanisms through which IOLERO may independently evaluate those conclusions. Potential approaches may include controlled review by designated personnel, review of derivative investigative materials, redaction protocols, limited disclosure procedures approved by County Counsel, memoranda of understanding, or production pursuant to a valid subpoena or court order, when necessary, consistent with Department of Justice guidance and applicable law.

The objective should be to balance the Sheriff's compliance obligations with IOLERO's legitimate oversight responsibilities while reducing recurring disputes regarding access expectations. A formal framework should seek to distinguish between investigative materials that may be made directly available to IOLERO consistent with applicable law and information that remains subject to CLETS or other legal restrictions requiring additional safeguards. Preserving subpoena and court order authority as a backstop would provide a lawful mechanism for resolving access disputes involving protected information while allowing routine oversight to occur through predictable information-sharing processes whenever possible.

§2-394(f) Observation of Administrative Interviews

Measure P Authority

Section 2-394(f) provides that the Director shall be provided access by the Sheriff-Coroner to personally sit in and observe the investigative interviews of any complainant, witness, or deputy who is the subject of an administrative investigation, upon request by the Director. This provision contemplates contemporaneous observation of administrative interviews during the investigative process and provides IOLERO with an opportunity to directly observe the development of the factual record before an investigation is completed.

Measure P Implementation

Classification: Not Implemented

The review did not identify evidence that IOLERO exercised its authority to observe administrative interviews during the review period. Although Measure P contemplates observation of administrative interviews as part of IOLERO's oversight responsibilities, the review did not identify evidence that this authority was utilized as a component of the office's routine audit or investigative activities.

Stakeholders provided differing perspectives regarding the reasons for the absence of this function. Sheriff's Office representatives indicated that IOLERO has not requested to observe investigative interviews. However, Internal Affairs does not have an established practice of proactively notifying IOLERO of interviews. IOLERO staff explained that for investigations initiated by the Sheriff's Office, they are typically notified only after the investigation has been completed and referred for audit. As a result, IOLERO does not receive contemporaneous access to the investigative file or evidence before interviews occur.

The review did not identify evidence that the Sheriff's Office denied a request by IOLERO to observe an administrative interview. Rather, the review found that the authority was not exercised during the review period and that existing notification and case coordination practices do not provide IOLERO with contemporaneous awareness of investigative interviews necessary to meaningfully exercise that authority.

Authority Alignment Analysis

1. Operational Agreement

Classification: Silent on Measure P Authority

The Operational Agreement does not contain provisions specifically addressing IOLERO's authority to observe administrative interviews. The agreement establishes procedures governing complaint review, auditing, investigations, and access to information but does not create a specific process for interview observation nor modify the authority established by §2-394(f).

Accordingly, the Operational Agreement is silent regarding implementation of this authority.

2. Letters of Agreement

Classification: Reflects and Narrows Measure P

The Letters of Agreement recognize IOLERO's authority to observe administrative interviews but modify the manner in which that authority is exercised.

Measure P provides that the Director may personally sit in and observe investigative interviews. By contrast, the Letters of Agreement provide that bargaining unit members required to submit to an investigative interview "will be subject to the access provided by the Sheriff-Coroner to the IOLERO Director, with the understanding that the IOLERO Director will observe by closed circuit video administered by the Sheriff's Office, but not participate in, the unit member's investigative interview."[109]

The Letters of Agreement therefore preserve the ability to observe interviews while replacing in person observation with observation through a Sheriff's Office administered closed circuit video system. As a result, the Letters of Agreement reflects the underlying authority granted by Measure P but narrows the manner in which the authority may be exercised.

Observation: Practical Limitations of the Interview Observation Process

The review identified significant differences between the interview observation authority contemplated by Measure P and the implementation model established by the Letters of Agreement.

Measure P appears to envision direct and contemporaneous access to administrative interviews upon request. As discussed above, the Letters of Agreement replace in person attendance with observation through closed circuit video. Although this preserves the ability to observe an interview, it reflects a substantial departure from the implementation model described in the ordinance and introduces practical limitations that affect the usefulness of the observation authority.

First, the review found that meaningful interview observation depends upon contemporaneous familiarity with the underlying investigation. However, IOLERO generally receives investigative files only after the investigation has been completed and referred for audit. As a result, IOLERO ordinarily does not have the opportunity to review the allegations, investigative materials, or evidence before interviews occur. Even where interview observation is available, the absence of contemporaneous access to the investigative file substantially limits IOLERO's ability to understand the context of the interview, identify investigative issues, or recognize areas warranting further inquiry.

Second, the review found that observation through a closed circuit video system does not provide a mechanism for IOLERO's to communicate questions or concerns that arise during the interview. Unlike with in person observation, IOLERO could alert the assigned investigator to issues requiring clarification, suggest appropriate follow up questions, or otherwise communicate observations while the investigation remains active. Consequently, questions identified during the interview may not be addressed until after the investigation has been completed, reducing the practical value of contemporaneous observation.

The review did not have access to the majority of underlying investigative files or independently evaluate interview scheduling practices. Accordingly, it cannot determine whether interview observation would have been appropriate or beneficial in particular cases. Nevertheless, the review concludes that the current implementation model presents practical limitations that reduce the effectiveness of the interview observation authority contemplated by Measure P.

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[109] Letters of Agreement § IV(A)(iii).

Recommendation #11: Enhance the Practical Implementation of Interview Observation

The review recommends that IOLERO and the Sheriff's Office jointly establish a written protocol governing notification of administrative interviews that are eligible for IOLERO observation.

The protocol should identify:

- which interviews are subject to notification;
- how notice will be provided;
- minimum notification timeframes when practicable;
- designated points of contact within each organization;
- procedures for documenting whether IOLERO elects to observe a particular interview;
- whether investigative information may be made contemporaneously available to IOLERO before an interview to permit meaningful observation , consistent with Measure P and applicable legal restrictions; and
- a structured process through which questions or issues identified by IOLERO during interview observation may be communicated to the assigned investigator, either during the interview when practicable or through a documented post-interview follow up process to determine whether additional inquiry is warranted.

The recommendation is not intended to require IOLERO participation in every administrative interview. Rather, the objective is to ensure that the opportunity contemplated by Measure P remains meaningfully available and that both organizations share a common understanding regarding notification responsibilities. Establishing procedures for timely notification, appropriate contemporaneous access to investigative information, and communication regarding follow-up questions would improve the practical value of interview observation while preserving the Sheriff's Office's responsibility for conducting administrative investigations.

Observation: Delegation of Interview Observation Authority

The review also identified ambiguity regarding whether the interview observation authority is limited exclusively to the Director or may be exercised by IOLERO staff acting under the Director's supervision. Measure P specifically references the Director and provides that the Director shall be provided access to “personally” observe investigative interviews. Other provisions of Measure P similarly assign responsibilities to the Director that, in practice, are routinely carried out by IOLERO staff or auditors acting under the Director's supervision. For example, the review found that auditors routinely prepare and transmit preliminary audit reports, develop recommendations, engage directly with Internal Affairs investigators regarding those recommendations, and respond to feedback received during the review process before final reports are issued.

These activities reflect a practical delegation of responsibilities consistent with the Director's supervisory role. By comparison, limiting interview observation exclusively to the Director may unnecessarily narrow the practical exercise of this authority, particularly where the assigned auditor possesses the greatest familiarity with the investigation and would be best positioned to meaningfully observe the interview. The review therefore identified an unresolved question regarding whether the Letters of Agreement should be interpreted as limiting the practical exercise of this authority to the Director personally, or whether Measure P permits the authority to be exercised through IOLERO staff under the Director's direction.

§2-394(g) Direct Access to Sheriff's Office Staff

Measure P Authority

Section 2-394(g) requires the Sheriff-Coroner to provide IOLERO direct, unfettered access to Sheriff's Office staff, including investigators, employee witnesses or records custodians, supervisors of employees under review, and staff gathered for training opportunities. Unlike many of the access provisions discussed elsewhere in Measure P, this section contemplates not only access to information but also direct interaction between IOLERO and Sheriff's Office personnel throughout the oversight process.

Measure P Implementation

Classification: Partially Implemented

Section 2-394(g) is distinct from many of the authorities evaluated in this report because it places an affirmative responsibility on the Sheriff's Office to facilitate the access and cooperation necessary for IOLERO to carry out its oversight responsibilities. Although this review does not separately assess the Sheriff's Office's compliance with Measure P, the nature of this provision is relevant to evaluating the extent to which IOLERO has exercised the opportunities for direct engagement contemplated by §2-394(g).

During the review period, the office communicated directly with Sheriff's Office personnel in connection with audits, requests for information, and independent investigations. Interviews indicated that these communications generally occurred through formal channels, primarily by email, with occasional telephone conversations to address specific case related issues or requests for clarification. While these communications supported the completion of individual audits and investigations, they remained largely transactional and focused on specific matters rather than broader organizational engagement. The review found that opportunities for regular professional dialogue, collaborative problem solving, training engagement, and relationship building outside the context of individual cases have not yet been consistently exercised or fully developed.

Sheriff's Office stakeholders consistently expressed interest in more frequent interaction with IOLERO staff outside the context of completed audits and investigations. Several stakeholders indicated that opportunities for direct communication with auditors, attendance at training, site visits of the jail, and routine professional interaction could improve mutual understanding and strengthen working relationships between the organizations.

These observations are consistent with the NACOLE's *Access to Agency Leadership* principle of effective oversight, which recognizes the importance of oversight agencies maintaining meaningful access to law enforcement leadership and Internal Affairs personnel through regular professional communication outside of the context of individual cases. Ongoing engagement promotes collaboration, improves mutual understanding of investigative and oversight practices, facilitates implementation of recommendations, and supports organizational improvement while preserving the oversight agency's independence. The review found that, while case specific communication occurred throughout the review period, more structured engagement with Sheriff's Office leadership could further support collaboration, improve mutual understanding of oversight expectations, and facilitate the timely resolution of operational issues consistent with the objectives of Measure P.

Since the conclusion of the review period, the review understands that IOLERO has begun taking steps to more actively exercise the communication and relationship building authorities contemplated by § 2-394(g). Those efforts were outside the scope of this review and therefore were not evaluated, but they may represent positive progress toward implementing this provision.

Accordingly, the review concludes that this authority has been partially implemented. While IOLERO has established mechanisms for direct communication with Sheriff's Office personnel and has begun expanding professional engagement beyond individual audits and investigations, significant aspects of the broader direct access authority contemplated by Measure P have not yet been consistently exercised. Continued development of collaborative communication practices would further advance the intent of this provision.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects Measure P

The Operational Agreement generally reflects Measure P's expectation of cooperation and information sharing between IOLERO and the Sheriff's Office.[110] It establishes IOLERO's access to Sheriff's Office records and investigative materials and provides that IOLERO staff "will have the ability to search all completed citizen complaint investigations and all completed administrative investigations."[111]

The agreement further contemplates ongoing coordination between the agencies regarding complaint review, auditing, and investigative functions. However, unlike Measure P, the Operational Agreement does not contain specific provisions addressing direct access to Sheriff's Office employees, supervisors, investigators, records custodians, or personnel gathered for training opportunities. Accordingly, the agreement reflects the cooperation and access contemplated by §2-394(g) through its broader framework for access, information sharing, and

[110] Operational Agreement § D.3.
[111] Operational Agreement § D.3(a).

coordination between IOLERO and the Sheriff's Office, rather than through provisions specifically implementing each category of personnel access identified in the ordinance.

2. Letters of Agreement

Classification: Reflects and Expands Upon Measure P

The Letters of Agreement contain several provisions implementing IOLERO's ability to communicate directly with Sheriff's Office personnel during audits and independent investigations.

For audits, the Letters of Agreement expressly authorize IOLERO staff to contact unit members when necessary to ensure the completeness and fairness of a review. Specifically, IOLERO staff may contact the involved unit member, the unit member's supervisor, Internal Affairs investigators, and other Sheriff's Office personnel regarding a complaint investigation.[112]

For independent investigations, the Letters of Agreement authorize IOLERO to contact complainants, witnesses, custodians of evidence, and other relevant persons.[113]

At the same time, the Letters of Agreement narrow Measure P by clarifying that IOLERO "shall not direct the activities of represented employees" and by providing that communications with bargaining unit members should occur during regular business hours whenever possible.[114] These provisions preserve labor protections and management authority while still providing meaningful opportunities for direct communication.

Accordingly, the Letters of Agreement substantially implements the direct access authority contemplated by Measure P but does so through a structured labor relations framework that establishes parameters governing how and when those contacts occur.

Observation: Relationship Building through Direct Engagement

Although this provision is primarily framed as an obligation of Sheriff's Office cooperation, the review found that §2-394(g) also creates opportunities to strengthen professional relationships between IOLERO and Sheriff's Office personnel. The review found that professional friction regarding authorities, access, and oversight roles exists across many aspects of the relationship between IOLERO and the Sheriff's Office. Stakeholders from both organizations described recurring disagreements regarding the scope and implementation of Measure P. At the same time, the review found consistent evidence that both organizations continue to perform their respective responsibilities professionally and that meaningful improvements have been achieved despite these areas of disagreement.

Stakeholder feedback from the Sheriff's Office consistently reflected a desire for more frequent interaction with IOLERO staff. Several stakeholders indicated that many deputies, supervisors,

[112] Letters of Agreement § IV(A)(vii).
[113] Letters of Agreement § IV(D)(iii)(a).
[114] Letters of Agreement § IV(D)(iii)(a).

and investigators primarily encounter IOLERO through audit reports, public reports, or media coverage rather than through direct professional interaction. As a result, IOLERO is sometimes perceived as a name on a report or an office rather than as a group of professionals engaged in a shared accountability process.

The review found particular interest among Sheriff's Office personnel regarding IOLERO attendance at training. Some stakeholders indicated that training participation would allow IOLERO staff to better understand what deputies are taught, how policies are operationalized in practice, and to evaluate the content, quality, and consistency of Sheriff's Office training programs. The review also noted that some IOLERO staff have historically expressed concern that attendance at training could create bias or compromise independence.

While maintaining independence remains important, the review did not identify evidence that observing training would impair IOLERO's oversight function. To the contrary, familiarity with Sheriff's Office training programs may improve IOLERO's ability to evaluate policy implementation, assess training adequacy, and formulate practical recommendations. Measure P specifically identifies staff gathered for training opportunities as a category of personnel to whom IOLERO should have direct access, suggesting that the drafters envisioned training as an appropriate point of engagement.

The review also found that other civilian oversight agencies maintain regular interaction with law enforcement personnel as part of their oversight responsibilities. For example, the New Orleans Office of the Independent Police Monitor (OIPM) is authorized under municipal ordinance to attend and observe police training sessions and routinely does so as part of its oversight function.[115] OIPM staff also participate in ride alongs, observe critical incident reviews, and engage directly with departmental personnel to assess how policies are implemented in practice. Public OIPM reports document these activities, including observation of use of force and de-escalation training and ongoing monitoring of departmental practices.[116] While Sonoma County's model differs in important respects, such examples demonstrate that professional engagement and independent oversight are not mutually exclusive.

Recommendation #12: Expand Structured Collaboration Between IOLERO and Sheriff's Office Personnel

The review recommends that IOLERO and the Sheriff’s Office continue developing structured opportunities for regular professional engagement beyond the review of completed investigations. Although the audit process necessarily relies upon documented findings and written responses, the review found relatively limited routine interaction between auditors and Internal Affairs investigators during the normal course of their work. Greater professional engagement may improve mutual understanding of investigative expectations, facilitate early

[115] New Orleans Code of Ordinances § 2-1121(11)(authorizing the Independent Police Monitor to attend and observe police training sessions).
[116] Office of the Independent Police Monitor, January 2026 Monthly Report (Jan. 2026), https://nolaipm.gov/wp-content/uploads/2026/02/OIPM-Monthly-Report-January-2026.pdf (last visited June 23, 2026).

resolution of scope or evidentiary questions, reduce misunderstandings during the audit process, and promote continuous improvement within both organizations.

Potential opportunities include:

- regular case coordination and meetings between assigned auditors and Internal Affairs investigators to discuss the status of active audits, clarify investigative scope, identify evidentiary questions, and address issues that may benefit from early discussion before issuance of a preliminary audit report;
- periodic meetings to discuss recurring investigative issues, audit observations, and lessons learned across completed investigations;
- attendance at selected Sheriff's Office training programs;
- Sheriff’s Office personnel participation in oversight training;
- participation in educational or informational sessions designed to improve mutual understanding of investigative and/or oversight processes; and
- joint after action discussions following completion of significant audits to identify process improvements benefiting both organizations.

This recommendation recognizes that effective oversight depends not only on access to records but also on professional familiarity and communication. More frequent interaction would allow auditors and investigators to develop a shared understanding of investigative expectations, reduce unnecessary disagreements arising from misunderstandings, and improve the quality of both investigations and audits while preserving each organization's independent responsibilities. This recommendation therefore reflects a shared responsibility: effective oversight requires both meaningful access and cooperation from the Sheriff’s Office and active, sustained professional engagement by IOLERO.

While outside the review period, the review notes that IOLERO leadership has already begun taking steps in this direction through increased communication with Internal Affairs personnel and efforts to attend Sheriff's Office training. Continued expansion of those efforts may strengthen relationships, improve communication, and enhance the effectiveness of the oversight system as a whole.

§2-394(h) Interference with Constitutionally and Statutorily Designated Functions of the Sheriff

Measure P Authority

Section 2-394(h) provides that nothing in Measure P shall be interpreted or applied in a manner that interferes with the constitutionally and statutorily designated functions of the Sheriff-Coroner. This provision reflects the legal framework governing the Office of the Sheriff as an independently elected constitutional officer and establishes a limiting principle on the scope of IOLERO’s authority.

Rather than creating an affirmative duty or operational requirement, §2-394(h) functions as a boundary setting provision. It clarifies that the oversight authorities granted to IOLERO must be exercised in a manner that does not infringe upon the Sheriff's core law enforcement, administrative, and managerial responsibilities as defined by state law.

Measure P Implementation

Classification: Outside the Scope of Review

Unlike most provisions analyzed in this review, §2-394(h) does not establish a discrete authority, duty, reporting requirement, or procedural obligation that can be directly evaluated for compliance. Instead, it operates as a legal constraint on how other provisions of Measure P are interpreted and implemented.

As a result, this section is not susceptible to a standalone implementation assessment. Its relevance arises in the context of how IOLERO's authorities are exercised and whether those activities remain consistent with the Sheriff's independent constitutional role.

Authority Alignment Analysis

1. Operational Agreement

Classification: Reflects Measure P

The Operational Agreement reflects the principle embodied in §2-394(h) by structuring IOLERO's access, audit, and investigative functions in a manner that preserves the Sheriff's operational control over personnel and law enforcement activities. The agreement establishes processes for information sharing, audit review, and independent investigations while maintaining clear distinctions between oversight functions and command authority.[117]

Although the agreement does not explicitly restate §2-394(h), its provisions are generally consistent with the requirement that IOLERO's activities not interfere with the Sheriff's constitutionally and statutorily designated functions.

2. Letters of Agreement

Classification: Reflects Measure P

The Letters of Agreement reinforce the principle set forth in §2-394(h) by establishing parameters governing IOLERO's interactions with represented employees and clarifying that IOLERO does not direct the activities of Sheriff's Office personnel. These provisions preserve management authority and labor protections while allowing IOLERO to carry out its oversight responsibilities.[118]

[117] Operational Agreement §§ D.1(i)-(j), D.2(a)-(c).
[118] Letters of Agreement § IV(D)(iii)(a).

By defining the procedures governing IOLERO's engagement with Sheriff's Office personnel, the Letters of Agreement help ensure that oversight activities are conducted in a way that respects the Sheriff's independent authority.

§2-395 Budget

Measure P Authority

Section 2-395 establishes funding requirements for IOLERO and provides that the Board of Supervisors shall appropriate sufficient funds to allow IOLERO to carry out its duties and responsibilities under the ordinance.

Measure P Implementation

Classification: Substantially Implemented

The review did not conduct an independent assessment of County budgeting processes, staffing analyses, or funding adequacy. However, interviews conducted as part of this review indicated that IOLERO staff generally viewed the budget provision as being honored and reported that the office had sufficient resources to carry out its core responsibilities during the review period.

Stakeholders noted that workload, staffing levels, and the growing audit backlog remain ongoing operational considerations. However, these concerns were generally discussed in the context of organizational growth, expanding responsibilities under Measure P, and the office's capacity to sustain and further develop its oversight functions rather than as evidence that the County had failed to implement the budget provision itself.

Accordingly, the review concludes that §2-395 is substantially implemented. Available evidence indicates that IOLERO received resources sufficient to maintain its core functions during the review period, while staffing capacity and workload pressures continue to affect the office's ability to expand or sustain certain oversight activities.

Authority Alignment Analysis

Unlike other provisions of Measure P, §2-395 is not operationalized through the Operational Agreement or Letters of Agreement between the Sheriff's Office and IOLERO. Instead, it establishes a direct obligation on the Board of Supervisors related to funding and resource allocation.

As a result, the Operational Agreement and Letters of Agreement do not modify, interpret, or limit this authority. Budget decisions are made through the County's standard budgeting processes, which exist independently of the oversight framework governing IOLERO's access and authority. Accordingly, there are no identified alignment issues between Measure P and implementing agreements with respect to this provision.

Observation: Budgetary Independence Supports Effective Civilian Oversight

Although the review did not evaluate the adequacy of IOLERO's funding, it found that Sonoma County's budgeting structure generally reflects nationally recognized principles regarding the financial independence of civilian oversight agencies. Unlike some oversight models in which funding is controlled or influenced by the law enforcement agency being overseen, Measure P places responsibility for appropriating funds directly with the Board of Supervisors. This structure is consistent with NACOLE's principle of *Adequate Resources*, which recognizes that effective civilian oversight depends upon sufficient resources and budgetary arrangements that support the oversight agency's ability to fulfill its responsibilities while maintaining its independence from the agency it oversees.

§2-396 Triennial Review

Measure P Authority

Section 2-396 requires that IOLERO be subject to a performance audit at least once every three years to determine whether the office is operating effectively and efficiently and whether it is meeting recognized best practices for civilian oversight as established through comparison with agencies with similar missions.

Measure P Implementation

Classification: Substantially Implemented

This review constitutes the independent review required by §2-396 and therefore represents the fulfillment of this statutory responsibility. During stakeholder interviews, several stakeholders noted the importance of conducting these reviews on a regular schedule to promote accountability, organizational learning, and continuous improvement. Although Measure P was approved by voters in 2020, the first triennial review was initiated approximately six years later.

Accordingly, the review concludes that §2-396 has been substantially implemented. IOLERO funded and initiated the independent triennial review required by Measure P, and the review is being completed consistent with the ordinance. However, because the first review was initiated approximately six years after Measure P was approved, the recurring three-year schedule required by §2-396 was not fully implemented during the initial review cycle.

Authority Alignment Analysis

The Operational Agreement and Letters of Agreement reviewed as part of this assessment do not substantively address or implement the triennial review requirement established by §2-396. This provision establishes a recurring requirement that IOLERO be subject to an independent evaluation and does not involve operational coordination between IOLERO and the Sheriff's Office. As a result, no alignment issues were identified between Measure P and the Operational Agreement or Letters of Agreement with respect to this requirement.

Recommendation #13: Prioritize the Triennial Review as a Core Measure P Responsibility

Measure P requires an independent triennial review of IOLERO to evaluate implementation of the ordinance and identify opportunities for organizational improvement. Because the review occurs on a fixed statutory schedule, it should be treated as a recurring organizational priority.

The triennial review requires advance planning to ensure sufficient time and resources are available to complete an independent evaluation consistent with Measure P. Planning for this recurring statutory obligation promotes timely procurement, reduces administrative uncertainty, and helps ensure future reviews are completed on schedule without disrupting IOLERO's ongoing oversight responsibilities.

Accordingly, IOLERO should prioritize funding and scheduling for future triennial reviews as part of its long-term financial planning and annual budget development process.

§2-397 Community Advisory Council

Measure P Authority

Section 2-397 establishes the CAC and outlines its composition, appointment process, duties, and responsibilities. Measure P assigns the CAC a role in increasing public visibility into the delivery of policing and corrections services, providing community participation in the review and establishment of Sheriff's Office policies, procedures, and practices, training, and initiatives, and engaging the public to better understand the role of IOLERO and the Sheriff's Office.

The ordinance further establishes membership qualifications, appointment procedures, meeting requirements, and other governance provisions intended to support the CAC's advisory function.

Measure P Implementation

Classification: Outside the Scope of Review

The CAC was excluded from the approved scope of work for this triennial review. Accordingly, no conclusions are offered regarding the implementation or effectiveness of the CAC's composition, appointment process, governance, activities, recommendations, or compliance with §2-397. Although references to CAC activities appeared in annual reports and stakeholder interviews, those references were considered only for contextual purposes and were not independently evaluated as part of this review.

V. Strengthening Jail Oversight Through Implementation of National Correctional Oversight Best Practices

Overview

The review found that IOLERO has fully implemented Measure P's jail oversight authorities, particularly in the areas of complaint auditing, independent death investigations, and some policy review. However, like in patrol oversight operations, IOLERO's jail oversight operations remain primarily retrospective and focused on individual incidents and investigations rather than systemic review designed to improve conditions of confinement and prevent failed operations or critical incidents.

National carceral oversight experts agree that effective jail oversight requires regular access to jail facilities, staff, and incarcerated people; systematic review of jail policies, procedures, and practices; contemporaneous monitoring of grievances, uses of force, and in-custody deaths and other critical incidents; access to documentation related to all aspects of jail operations, including personnel records; and regular public reporting.[119] IOLERO's current structure and authorities provide for some, but not all, aspects of effective jail oversight, and IOLERO exercises some, but not all, of its current authorities pursuant to Measure P and negotiated agreements.

This assessment offers recommendations consistent with nationally recognized jail oversight standards and informed by IOLERO leadership's expressed interest in continuing to develop the office's jail oversight function. IOLERO's existing authorities provide a strong foundation for many of these functions. However, the office's current oversight model incorporates some, but not all, of these recognized practices.

Measure P Jail Related Authorities

Measure P grants IOLERO the authority to:

- Review and audit complaints
- Independently investigate in-custody deaths
- Access information necessary for oversight activities
- Review detention policies, practices, and training
- Develop policy recommendations
- Analyze patterns, trends, and systemic issues

[119] Michele Deitch**,** *Independent Oversight Is Essential for a Safe and Healthy Prison System*, in Excessive Punishment: How the Justice System Creates Mass Incarceration 190-98 (Lauren-Brooke Eisen ed., Columbia Univ. Press 2024); NACOLE, *Principles for Effective Oversight*.

Assessment of Current Measure P Implementation

Classification: Fully Implemented

IOLERO has fully implemented Measure P's jail oversight authorities through its auditing of inmate complaints, reviews of death in-custody, and evaluation of Sheriff's Office policies, practices, and training when those issues arise during individual audits or investigations. Annual reports and stakeholder interviews consistently identified auditing as one of IOLERO's strongest functions. As with IOLERO's patrol oversight operations, jail related complaint audits and investigations are conducted using the same structured methodology described elsewhere in this report. IOLERO has also increasingly used audits and death investigations to identify policy and operational issues in the jail and has developed corresponding recommendations for improvement. The Sheriff's Office has implemented some of IOLERO's recommendations, and both IOLERO and the Sheriff's Office report operational improvements as a result.

However, because IOLERO's reviews are limited to issues that arise through specific audits or investigations, its jail related findings and recommendations tend to be narrow in scope, limited in frequency, and are more reactive to specific incidents than proactive in identifying and correcting systemic deficiencies before they result in failed operations or critical incidents. While this approach is consistent with the authorities established by Measure P, it incorporates some, but not all, of the functions commonly associated with comprehensive jail oversight programs. Additionally, during stakeholder interviews, IOLERO leadership described the jail oversight function as an area for continued organizational development and sought input regarding how the office's existing jail oversight operations compared with recognized correctional oversight practices.

National correctional oversight frameworks recognize that effective jail oversight may also include ongoing monitoring of detention operations, conditions of confinement, grievance systems, operational practices, and other organizational processes designed to identify systemic issues before they contribute to operational failures or critical incidents.[120] This is consistent with NACOLE's Principle of *Policy and Pattern Analysis*, expanding the office's oversight model through broader organizational review and performance audit oversight represents one opportunity to continue developing IOLERO's jail oversight operations.

Accordingly, the review found that IOLERO has fully implemented its jail oversight responsibilities established by Measure P. The recommendations that follow build upon that strong foundation by identifying opportunities to further develop the office's jail oversight operations through existing authorities and nationally recognized correctional oversight practices.

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[120] Prison and Jail Innovation Lab, National Resource Center for Correctional Oversight, *Correctional Oversight: Key Principles and Resources*, University of Texas at Austin, Lyndon B. Johnson School of Public Affairs, https://prisonoversight.org/ (last visited July 14, 2026).

Recommendation #14: Jail Related Recommendations

The review recommends that Sonoma County strengthen IOLERO's existing statutory authorities in jail oversight by establishing a dedicated jail monitoring function within the office. An initial expansion of IOLERO's staff to include two dedicated jail monitors, described in more detail below, would permit IOLERO to implement each of its authorities pursuant to Measure P and negotiated agreements and build on IOLERO operations without significant organizational restructuring. IOLERO should create a dedicated jail monitoring function centered on grievance review, early monitoring of mortality reviews, routine facility visits, systemic analysis of jail conditions, and regular public reporting. This approach provides the greatest opportunity to strengthen accountability while leveraging IOLERO's existing authorities and structure. A robust jail monitoring function within IOLERO would include some measure of each of the following:[121]

Routine Review and Analysis of Grievances Filed by Incarcerated People

Currently, IOLERO does not systematically review grievances filed by incarcerated people or grievance data tracked by SCSO. The routine review of grievances and grievance data pursuant to IOLERO's existing authority provides an opportunity to identify a broad range of potential deficiencies in many aspects of jail operations and conditions. Grievances often serve as the earliest indication of systemic issues or problematic patterns or practices and should lay the foundation for IOLERO's expanded jail oversight program. As discussed in §2-394(b)(8), regarding IOLERO's authority to track, analyze, and advise on law enforcement audit trends, the routine analysis of grievance data provides an additional opportunity to identify recurring operational issues and inform broader organizational improvements beyond individual case review. IOLERO should consider combining the regular review of grievance data and trends with periodic audits of individual grievances and SCSO responses to identify recurring themes, operational risks, and systemic concerns requiring further review.

Enhanced Review of Deaths In-Custody

IOLERO has made substantial progress implementing its authority to independently investigate in-custody deaths and should continue to prioritize this work. Independent death investigations remain an important accountability mechanism under Measure P. Like grievances, reviews of the circumstances surrounding deaths of incarcerated people are critical in identifying lapses in care or supervision. IOLERO should begin to attend any SCSO internal mortality reviews that occur in the days or weeks following a death of a person in-custody. They should track any operational deficiencies (failed safety checks, inadequate healthcare, institutional violence, etc.) as well as

[121] Current SCSO jail conditions may generally meet or exceed constitutional requirements under the Eighth and Fourteenth amendments and follow national standards for modern jail operations and the humane treatment of incarcerated people. If so, a more limited jail oversight program may be appropriate. The County may consider retaining a vendor to complete an initial assessment of conditions inside SCSO, which would inform the scale and scope of a jail oversight function within IOLERO. Vendors should have specific expertise operating a jail consistent with contemporary correctional standards and should be jointly selected by SCSO and IOLERO.

any corrective action planned or taken by SCSO in response. IOLERO’s presence at any of SCSO’s mortality reviews would provide for early identification of policy, training, and operational lapses requiring remediation.

Regular Jail Visits, Policy Review, and Monitoring of Conditions

Effective jail oversight extends beyond the review of individual complaints and critical incidents to include regular observation of detention operations and evaluation of policies, practices, and other high-risk operational areas. Routine site visits, systematic review of grievances, and early access to Sheriff's Office mortality investigations would provide IOLERO with additional opportunities to evaluate facility conditions, the delivery of programs and services, and operational practices that may not be fully reflected in reports, investigations, or other documentation.

Routine jail monitoring represents one method of exercising that authority by evaluating recurring operational issues beyond individual complaints or critical incidents. These activities would support IOLERO's review of Sheriff's Office policies, practices, and training while facilitating broader evaluations of recurring operational issues affecting the safety, security, and welfare of incarcerated individuals and Sheriff's Office personnel. Areas commonly evaluated through this type of oversight include medical and mental health care, use of force, inmate classification, disciplinary and restrictive housing practices, institutional violence, contraband interdiction, and conditions of confinement.

Proactive operational oversight provides opportunities to identify recurring issues before they contribute to critical incidents, improve policy implementation, reduce organizational risk, and strengthen accountability through continuous organizational learning. By evaluating patterns across multiple events rather than individual incidents alone, IOLERO would be better positioned to issue recommendations focused on long-term operational improvement while complementing its existing audit and investigative responsibilities.

Expanded Public Reporting

Public reporting is an essential component of effective oversight and promotes transparency and accountability. As discussed in §2-394(b)(9) Annual Reports and Ad Hoc Reports**,** public reporting is one of IOLERO's strongest and most mature oversight functions. Expanding that reporting to include routine jail oversight activities would build upon an already well-established organizational practice. IOLERO should expand its public reporting to include findings from its jail-related monitoring, including data trends, analysis of policies and conditions, recommendations, and corrective action or operational changes. Enhanced reporting would improve public understanding of detention-related issues and provide policymakers with information necessary to evaluate progress over time.

Staffing Requirements

As noted earlier in this section, the review recommends that IOLERO hire two dedicated jail monitors who would be responsible for grievance review, site visits, assessment of conditions and systemic issues, public reporting, tracking of recommendations, and providing support for independent death investigations. This recommendation builds upon the staffing analysis discussed in §2-393 Director and Staffing by recognizing that effective jail oversight requires specialized correctional expertise that complements, rather than replaces, IOLERO's existing patrol oversight program.

Effective jail oversight requires expertise in contemporary correctional healthcare and other detention operations, constitutional and statutory requirements for humane confinement, and national standards for contemporary jail operations. The review recommends that IOLERO hire jail monitors with this type of expertise rather than converting existing patrol auditors into jail monitors.

The recommended model is consistent with principles identified by Michele Deitch and the Jail & Prison Innovation Lab, which emphasize that effective correctional oversight combines investigation and auditing functions with ongoing monitoring, grievance review, facility observation, systemic analysis, and public accountability. The review's recommendation adapts these principles to Sonoma County's existing oversight structure by building upon IOLERO's current authorities and organizational capacity.

Long Term Policy and Legislative Changes

The review found that meaningful improvements can be achieved within IOLERO's existing authority. However, implementation of a mature jail oversight system may ultimately require modifications of current agreements, additional exercise of the Board of Supervisors' oversight authority, or legislative clarification of IOLERO's access.

VI. Conclusion

This triennial review assessed the extent to which Sonoma County has implemented the authorities and responsibilities established by Measure P and evaluated the extent to which the Operational Agreement and Letters of Agreement reflect, expand, or narrow those authorities in practice. Overall, the review found that IOLERO has evolved into a mature and effective civilian oversight agency that substantially fulfills the core purposes envisioned by Measure P and has become an established component of Sonoma County's accountability framework.

Since its establishment, IOLERO has developed professional oversight capacity, established a comprehensive audit program, established an accessible complaint intake process, strengthened the independent review of Sheriff's Office investigations, issued comprehensive public reports, and contributed to policy and organizational improvements. The review also found that several law enforcement stakeholders credited IOLERO with improving the overall quality of administrative investigations by strengthening investigative practices, increasing accountability, and promoting more thorough and consistent reviews.

The review also found that implementation is strongest in areas involving audit review, use of force oversight, and other matters receiving significant public attention. These functions have become well established components of IOLERO's operations and reflect substantial implementation of many of Measure P's core authorities. As discussed throughout this report, opportunities for continued development primarily involve expanding existing oversight capabilities, strengthening organizational processes, and further exercising authorities that support systemic analysis and continuous organizational improvement.

A recurring theme throughout the review involved differing interpretations regarding the practical implementation of Measure P, the Operational Agreement, and the Letters of Agreement. Although stakeholders expressed differing perspectives regarding the scope of certain oversight authorities, the review did not identify evidence that these differences prevented IOLERO from carrying out its core oversight responsibilities. Rather, they reflect the continuing evolution of a civilian oversight system that remains relatively young and continues to mature through professional collaboration, organizational learning, and the implementation of evolving oversight practices.

Building Upon a Strong Foundation

The challenges identified throughout this review are not unique to Sonoma County. Civilian oversight agencies across the country continue to refine their roles, clarify governing authorities, strengthen relationships with law enforcement agencies, and expand their oversight capabilities as the profession continues to evolve. In many respects, IOLERO is well positioned to continue that evolution. Compared to many civilian oversight agencies, IOLERO possesses broad statutory authority through its hybrid model, which combines independent auditing, independent investigative authority, and policy review responsibilities. Combined with a dedicated funding structure, these authorities provide a strong foundation for continued organizational growth. The recommendations contained in this report are intended to build upon that foundation by strengthening communication, quality management, recommendation tracking, organizational learning, and the consistent exercise of authorities already provided by Measure P rather than by recommending significant changes to the underlying statutory framework.

The review found that IOLERO has established a mature oversight program that provides a strong foundation for continued growth. The review recognizes that development of this core audit capacity required IOLERO to prioritize among competing Measure P responsibilities during its formative years; expansion of additional oversight functions should therefore be supported by sufficient organizational capacity to preserve the quality of the functions already established. As the office continues to evolve, opportunities exist to expand its oversight capabilities through performance audits and other systemic reviews that further exercise the existing authorities granted by Measure P to track, analyze, and advise regarding law enforcement audit trends. Consistent with NACOLE's Principle of *Policy and Pattern Analysis*, these activities would complement IOLERO's existing oversight responsibilities by providing additional insight into organizational performance and identifying opportunities for continuous improvement.

Consistent with the scope of work requested by IOLERO, this report also includes a targeted assessment of the office's jail oversight function and recommendations designed to strengthen oversight practices within the County's detention facilities. Correctional facilities have become an increasing area of focus for civilian oversight agencies nationwide because of their complexity, operational risks, and impact on community trust. The review found that IOLERO has established a strong foundation for jail oversight through its existing statutory authority, experience reviewing individual incidents, and established oversight processes. The recommendations contained in the jail assessment are intended to support the continued evolution of this important area of oversight through enhanced performance auditing, systemic review, and organizational learning.

Measure P established ambitious goals relating to transparency, accountability, public trust, and independent oversight. The review concludes that Sonoma County has made substantial progress toward achieving those goals and that IOLERO has become a credible, respected, and important institution within County government. Implementation of the recommendations contained in this report will further strengthen IOLERO's ability to exercise the authorities granted by Measure P, enhance organizational effectiveness, and support continued collaboration between IOLERO, the Sheriff's Office, County leadership, and the community. By continuing to invest in organizational capacity, refine oversight practices, and strategically expand its oversight capabilities as opportunities arise, IOLERO is well positioned to build upon the strong foundation established during its first years of operation and continue advancing the long term vision of independent civilian oversight envisioned by the voters of Sonoma County.

Appendix A: Authority to Practice Matrix

This matrix provides a consolidated summary of how the authorities established by Measure P have been implemented in practice. It identifies where governing agreements support or modify those authorities and summarizes the review's conclusions regarding IOLERO's current oversight practices and access to information.

Measure P Authority	Authority / Responsibility	Measure P	Operational Agreement	Letters of Agreement	Access Assessment	Operational Practice
§2-392	Establishing Independent Law Enforcement Review & Outreach	Fully Implemented	Reflects, Expands Upon, & Narrows Measure P	Reflects, Expands Upon, & Narrows Measure P	N/A	Conducts independent civilian oversight through audits, investigations, public reporting, complaint review, and policy assessment to promote accountability and transparency.
§2-393	Director & Staffing	Substantially Implemented	Reflects Measure P	Reflects Measure P	N/A	Maintains a director and professional staff responsible for audits, investigations, complaint intake, policy review, outreach, and administration.
§2-394(a)	Performance of Powers & Duties Subject to Confidentiality Requirements	Fully Implemented	Reflects Measure P	Reflects Measure P	N/A	Conducts oversight activities while safeguarding confidential information and balancing transparency with applicable legal restrictions.

Measure P Authority	Authority / Responsibility	Measure P	Operational Agreement	Letters of Agreement	Access Assessment	Operational Practice
§2-394(b)(1)	Receipt & Review of Citizen Complaint Review	Fully Implemented	Reflects & Expands Upon Measure P	Reflects Measure P	N/A	Receives complaints directly from the public, documents and tracks complaints, evaluates jurisdiction, and refers matters to the Sheriff's Office while independently monitoring complaint handling.
§2-394(b)(2)	Categories Subject to Review, Audit, & Analysis	Substantially Implemented	Reflects, Expands Upon, & Creates or Contributes Ambiguity to Measure P	Reflects & Narrows Measure P	N/A	Reviews complaints and investigations involving the categories identified in Measure P through audits, investigations, and annual reporting, with primary emphasis on case specific oversight.
§2-394(b)(2)(i)	Citizen Complaints Filed with IOLERO	Fully Implemented	—	—	N/A	Serves as an independent intake location for citizen complaints and forwards complaints for investigation while monitoring their disposition.
§2-394(b)(2)(ii) & (vii)	Uses of Force	Fully Implemented	—	—	N/A	Audits use of force investigations, evaluates investigative quality, policy compliance, evidentiary

Measure P Authority	Authority / Responsibility	Measure P	Operational Agreement	Letters of Agreement	Access Assessment	Operational Practice
						sufficiency, and investigative findings.
§2-394(b)(2)(iii)	Alleged Constitutional Violations	Fully Implemented	—	—	N/A	Evaluates constitutional issues arising in audits, investigations, use of force incidents, and in-custody deaths.
§2-394(b)(2)(iv)	Bias Based Policing & Discrimination	Fully Implemented	—	—	N/A	Reviews allegations of bias based policing and discrimination as part of complaint and investigative audits.
§2-394(b)(2)(v)	Sexual Misconduct Allegations	Fully Implemented	—	—	N/A	Audits investigations involving allegations of sexual misconduct, including PREA related investigations, using the same methodology applied to other misconduct investigations.
§2-394(b)(2)(vi)	Dishonesty Allegations	Fully Implemented	—	—	N/A	Reviews allegations involving dishonesty, credibility, documentation, and investigative integrity.

Measure P Authority	Authority / Responsibility	Measure P	Operational Agreement	Letters of Agreement	Access Assessment	Operational Practice
§2-394(b)(2)(viii)	Civil Litigation Involving Force or Misconduct	Substantially Implemented	—	—	N/A	Reviews qualifying civil litigation matters and uses a cross-checking process with County Counsel and Human Resources/Risk Management to identify matters not otherwise included in its audit caseload.
§2-394(b)(2)(ix)	Racial Profiling Data	Not Implemented	—	—	N/A	No routine process identified for analyzing racial profiling data as part of oversight activities.
§2-394(b)(2)(x)	Matters of Significant Public Interest or Media Attention	Fully Implemented	—	—	N/A	Conducts oversight of incidents receiving significant public attention, including officer involved shootings, in-custody deaths, and other critical incidents.
§2-394(b)(3)	Whistleblower Complaints	Outside the Scope of Review	N/A	N/A	N/A	Outside scope of review.
§2-394(b)(4)	Discipline Recommendations	Substantially Implemented	Reflects Measure P	Reflects & Expands	N/A	Evaluates disciplinary accountability in connection with its independent

Measure P Authority	Authority / Responsibility	Measure P	Operational Agreement	Letters of Agreement	Access Assessment	Operational Practice
				Upon Measure P		investigations, including assessing the appropriateness of discipline imposed for sustained policy violations and making recommendations concerning disciplinary consequences where appropriate.
§2-394(b)(5)	Review, Audit, Investigation, & Access Authorities	—	—	—	Mixed Access	Conducts audits and investigations using the authorities provided under Measure P to review evidence, assess investigative quality, and issue findings and recommendations.
§2-394(b)(5)(i)	Access & Review of Investigative Evidence	Substantially Implemented	Reflects & Narrows Measure P	Reflects, Narrows, & Creates or Contributes Ambiguity to Measure P	Limited Access	Reviews investigative files and evidence provided through established production processes to assess investigative completeness and evidentiary support.
§2-394(b)(5)(ii)	Review of Prior Complaints & Disciplinary History	Partially Implemented	Reflects & Creates or Contributes	Reflects, Narrows, & Creates or Contributes	Limited Access	Reviews prior complaint and disciplinary information when available or requested, although

Measure P Authority	Authority / Responsibility	Measure P	Operational Agreement	Letters of Agreement	Access Assessment	Operational Practice
			Ambiguity to Measure P	Ambiguity to Measure P		this practice is not consistently incorporated into audits.
§2-394(b)(5)(iii)	Review of Body Worn Camera & Other Recordings	Substantially Implemented	Reflects Measure P	Narrows Measure P	Generally Sufficient Access	Reviews body worn camera footage and other recordings as a routine component of audits and investigations.
§2-394(b)(5)(iv) & (v)	Contact with Witnesses & Evidence Custodians	Substantially Implemented	Silent on Measure P Authority	Reflects Measure P	N/A	Contacts witnesses and evidence custodians when necessary to clarify facts or support independent investigations.
§2-394(b)(5)(vi)	Requests for Supplemental Investigation	Fully Implemented	Reflects & Expands Upon Measure P	Reflects & Expands Upon Measure P	N/A	Identifies investigative deficiencies and requests supplemental investigation when additional inquiry is warranted.
§2-394(b)(5)(vii) & (viii)	Independent Investigations	Substantially Implemented	Silent on Measure P Authority	Reflects & Narrows Measure P	Limited Access	Conducts independent investigations in authorized matters, including in-custody deaths and other qualifying incidents.

Measure P Authority	Authority / Responsibility	Measure P	Operational Agreement	Letters of Agreement	Access Assessment	Operational Practice
§2-394(b)(5)(ix)	Subpoena Authority	Outside the Scope of Review	N/A	N/A	N/A	Outside scope of review.
§2-394(b)(6) & (7)	Findings, Recommendations, & Policy Improvement	Fully Implemented	Reflects Measure P	Reflects Measure P	N/A	Issues audit findings and recommendations and identifies opportunities for policy and organizational improvement.
§2-394(b)(8)	Track, Analyze, & Advise on Legislative Actions & Law Enforcement Audit Trends	Substantially Implemented	Silent on Measure P Authority	Silent on Measure P Authority	N/A	Monitors legislative developments and emerging oversight practices and incorporates relevant changes into oversight activities.
§2-394(b)(9)	Annual Reports & Ad Hoc Reports	Fully Implemented	Silent on Measure P Authority	Silent on Measure P Authority	N/A	Produces annual reports and, when appropriate, other public reports summarizing oversight activities and recommendations.
§2-394(b)(10)	Community Outreach	Outside the Scope of Review	N/A	N/A	N/A	Outside scope of review.

Measure P Authority	Authority / Responsibility	Measure P	Operational Agreement	Letters of Agreement	Access Assessment	Operational Practice
§2-394(b)(11)	Community Advisory Council	Outside the Scope of Review	N/A	N/A	N/A	Outside scope of review.
§2-394(c)	Limitations on Authority	Fully Implemented	Reflects Measure P	Reflects Measure P	N/A	Conducts oversight activities while recognizing statutory limitations on IOLERO's authority.
§2-394(d)	Written Protocols Between IOLERO & the Sheriff	Substantially Implemented	Reflects Measure P	Expands Upon Measure P	N/A	Implements oversight through written protocols governing coordination with the Sheriff's Office.
§2-394(e)	Access to Records & Information	Partially Implemented	Reflects & Narrows Measure P	Reflects & Narrows Measure P	N/A	Obtains records and information through negotiated access procedures, production processes, and information sharing.
§2-394(f)	Observation of Administrative Interviews	Not Implemented	Silent on Measure P Authority	Reflects & Narrows Measure P	N/A	Not implemented during the review period.

Measure P Authority	Authority / Responsibility	Measure P	Operational Agreement	Letters of Agreement	Access Assessment	Operational Practice
§2-394(g)	Direct Access to Sheriff's Office Staff	Partially Implemented	Reflects Measure P	Reflects & Expands Upon Measure P	N/A	Communicates directly with Sheriff's Office personnel regarding audits, investigations, requests for information, and other oversight activities.
§2-394(h)	Interference with Constitutionally & Statutorily Designated Functions	Outside the Scope of Review	Reflects Measure P	Reflects Measure P	N/A	Outside scope of review.
§2-395	Budget	Substantially Implemented	Silent on Measure P Authority	Silent on Measure P Authority	N/A	Operates with an independently appropriated budget sufficient to perform core oversight responsibilities.
§2-396	Triennial Review	Substantially Implemented	Silent on Measure P Authority	Silent on Measure P Authority	N/A	Participates in periodic independent triennial review of Measure P implementation.
§2-397	Community Advisory Council	Outside the Scope of Review	N/A	N/A	N/A	Outside scope of review.

Measure P Authority	Authority / Responsibility	Measure P	Operational Agreement	Letters of Agreement	Access Assessment	Operational Practice
Project Scope	Jail Oversight Assessment	Fully Implemented	N/A	N/A	N/A	Audits jail related complaints and conducts independent investigations of in-custody deaths while identifying opportunities to expand systemic jail oversight.

Appendix B: Stakeholders Interviewed

This appendix identifies the stakeholder groups and individuals interviewed as part of the triennial review. To preserve confidentiality, interviewees are organized by stakeholder category rather than individual attribution where appropriate.

Stakeholder Category	Number Interviewed
IOLERO Leadership and Staff	9
Sonoma County Sheriff's Office Personnel	4
County Officials and Staff	5
Labor Representatives	1
Community Stakeholders	4
Total	**23**

Appendix C: Benchmark Jurisdictions and Professional Frameworks Reviewed

The following jurisdictions were reviewed to provide examples of civilian oversight, inspector general functions, law enforcement accountability systems, and audit practices relevant to topics discussed in this report. Inclusion in this appendix does not imply that any jurisdiction was viewed as a direct model for Sonoma County. Rather, individual practices, authorities, and operational approaches were reviewed where relevant to specific aspects of the review.

Jurisdiction	Oversight Entity / Professional Framework	Primary Areas Reviewed
Jail and Prison Innovation Lab	Principles for Effective Jail Oversight	Professional principles for civilian oversight, including independence, clearly defined authority, access to information, public reporting, policy and pattern analysis, community engagement, and procedural justice
Los Angeles County, CA	Office of Inspector General / Sheriff Civilian Oversight Commission	Access authority, subpoena authority, sheriff oversight
Los Angeles Unified School District	Office of Inspector General	Audit methodology, recurring findings analysis, reporting practices
NACOLE	Principles for Effective Oversight	This approach focuses the analysis on perspectives shared across stakeholder groups rather than the views of individual participants and is intended to accurately reflect the information obtained during interviews.
New Orleans, LA	Office of Inspector General	Performance auditing, systemic oversight, public reporting
Oakland, CA	Community Police Review Agency / Police Commission	Access authority, subpoena authority, complaint investigations
San Francisco, CA	Department of Police Accountability	Investigative authority, access to information, public reporting
San Jose, CA	Independent Police Auditor	National correctional oversight practices relating to jail monitoring, grievance review, deaths in-custody, facility inspections, public reporting, and organizational oversight

Appendix D: Summary of Recommendations

Recommendation	Brief Summary
<u>Recommendation #1</u>: **Establish Regular Executive-Level Communication Regarding Administrative and Operational Matters**	Establish regular meetings between the IOLERO Director and County Executive Officer and include IOLERO in appropriate County department head meetings to address organizational priorities, budgeting, staffing, procurement, statutory obligations, and other administrative matters. These communications should preserve IOLERO's independence by excluding confidential investigations, unreleased audit findings, and other substantive oversight matters.
<u>Recommendation #2</u>: **Establish a Systemic Oversight Planning Process**	Develop a structured process for identifying and prioritizing systemic reviews and performance audits based on factors such as recurring complaint themes, litigation trends, use of force patterns, racial profiling indicators, in-custody deaths, policy changes, and legislative developments. This would complement IOLERO's individual case audits by directing available resources toward broader organizational issues and trends.
<u>Recommendation #3</u>: **Establish a Structured Case Notification and Coordination Process**	IOLERO and the Sheriff's Office should jointly establish a consistent process for identifying, communicating, and tracking matters subject to IOLERO review. The process should provide timely and reliable notification of qualifying cases and reduce reliance on informal or ad hoc information sharing.
<u>Recommendation #4</u>: **Clarify and Standardize the Process for Accessing and Utilizing Prior Complaint and Disciplinary Information**	Establish a clear process governing IOLERO's access to and use of prior complaint, investigative, Brady, and disciplinary information, including the respective responsibilities of IOLERO and the Sheriff's Office. The process should support both case specific review and identification of recurring patterns or trends.
<u>Recommendation #5</u>:	When substantial portions of publicly released reports or supporting records are redacted, IOLERO should, when legally permissible, provide a brief notation identifying the general basis for the redaction. This would improve public

Provide Explanatory Notations for Significant Public Redactions	understanding while preserving legally protected information.
Recommendation #6: **Identify and Track Recurring Audit Findings with the Goal of Improving Sheriff's Office Investigations**	Develop a formal process for identifying recurring findings across audits and investigations and noting when the same deficiency has appeared in prior reports. IOLERO should use prior findings and recommendations to assess whether recurring issues have been resolved, partially addressed, or remain ongoing organizational concerns.
Recommendation #7: **Differentiate Investigative Sufficiency from Opportunities for Improvement**	Refine audit and investigation methodology to distinguish deficiencies that materially affect the evidentiary sufficiency or reliability of an investigative finding from issues that primarily present opportunities to improve future investigative practices. Reports should explain the relationship between an identified deficiency and IOLERO's ultimate assessment of the investigation.
Recommendation #8: **Develop a Centralized Recommendation Tracking and Response Process**	Further develop IOLERO's internal database as a centralized system for tracking recommendations, Sheriff's Office responses, implementation status, corrective actions, and recurring organizational themes. Appropriate information should also be incorporated into periodic public reporting to improve transparency regarding implementation progress.
Recommendation #9: **Adopt a Case Audit Prioritization Framework**	Establish formal criteria for prioritizing case audits when available resources are insufficient to review all pending matters contemporaneously, considering factors such as case age, significance, recurring or systemic issues, current policy relevance, disciplinary time limits, and potential organizational impact. The framework should prioritize timely, actionable oversight while preserving IOLERO's discretion to review older matters presenting significant or systemic concerns.
Recommendation #10: **Develop a Controlled Access Framework for CLETS-Derived Information**	The County, Sheriff's Office, County Counsel, employee organizations, and IOLERO should evaluate a legally compliant framework that permits meaningful oversight of investigations involving CLETS-derived information without providing IOLERO unrestricted CLETS access. The framework should distinguish CLETS-protected

	information from other investigative records and identify lawful mechanisms for IOLERO to independently evaluate investigative conclusions.
Recommendation #11: **Enhance the Practical Implementation of Interview Observation**	IOLERO and the Sheriff's Office should establish a written protocol for notifying IOLERO of administrative interviews eligible for observation, including notice procedures, responsible contacts, and documentation of whether IOLERO elects to observe. As the practice is developed, the parties should also address access to sufficient contemporaneous investigative information and a mechanism for communicating issues identified during observation.
Recommendation #12: **Expand Structured Collaboration Between IOLERO and Sheriff's Office Personnel**	Expand regular professional interaction between IOLERO and Sheriff's Office personnel through case coordination, recurring meetings, discussion of systemic investigative issues, training opportunities, and after action discussions. The goal is to improve communication and mutual understanding while preserving the independent responsibilities of both organizations.
Recommendation #13: **Prioritize the Triennial Review as a Core Measure P Responsibility**	Incorporate future triennial reviews into long-term planning and the applicable annual budget process so sufficient time and resources are available for procurement and completion on the three-year schedule required by Measure P. Advance planning should allow the recurring review to occur without unnecessarily disrupting IOLERO's ongoing oversight responsibilities.
Recommendation #14: **Jail-Related Recommendations**	Develop a more comprehensive and proactive jail oversight function that supplements review of individual incidents with ongoing monitoring, systemic analysis, and public reporting. The recommended model includes the five components below.
14(a) Routine Review and Analysis of Grievances Filed by Incarcerated People	Establish routine access to and analysis of jail grievances to identify recurring concerns, patterns, and systemic issues affecting incarcerated people. Grievance review should inform broader oversight priorities rather than function solely as review of individual complaints.

14(b) Enhanced Review of Deaths in Custody	Strengthen review of in-custody deaths through a more comprehensive approach that examines not only the immediate incident but also relevant medical care, supervision, policies, practices, and systemic factors. The objective is to identify preventable risks and opportunities for organizational improvement.
14(c) Regular Jail Visits, Policy Review, and Monitoring of Conditions	Establish regular facility visits and ongoing review of jail policies, practices, and conditions so IOLERO can develop first-hand familiarity with detention operations and identify emerging issues. This monitoring should complement complaint, audit, and investigative functions.
14(d) Expanded Public Reporting	Expand public reporting regarding jail oversight to communicate significant trends, systemic issues, oversight activities, recommendations, and implementation progress. Enhanced reporting would improve transparency and provide the public and policymakers with information necessary to assess detention-related conditions and reforms.
14(e) Staffing Requirements	Hire two dedicated jail monitors with specialized correctional expertise to conduct grievance review, facility visits, conditions monitoring, systemic analysis, recommendation tracking, public reporting, and support for independent death investigations. These positions should supplement rather than replace IOLERO's existing patrol oversight capacity.