



# Stop LAPD Spying Coalition

October 8, 2019

LAPD Chief of Police Michel Moore  
Los Angeles Police Department  
100 West First Street  
Los Angeles, California 90012

Dear Chief Michel Moore:

On June 4th 2019, the Stop LAPD Spying Coalition (Coalition) wrote<sup>1</sup> to the Los Angeles Board of Police Commissioner (BOPC) in follow up to the dismantlement and discontinuation of Operation LASER and the Chronic Offender Bulletin program, as the community remains deeply concerned about numerous outstanding matters related to these programs.

In this letter, we detailed twelve points of concern, and demanded that BOPC instruct LAPD on those concerns in a clear and timely manner, and report back with thorough documentation once completed.

What followed was a series of deflections, non-responses, delays, and misrepresentations, including the following steps taken by the department:

- On June 10th, 2019, the Coalition's letter to the Police Commission was changed into Records Request #19-3168 and assigned to LAPD<sup>2</sup> Discovery section yet was never uploaded into the [lacity.nextrequest.com](https://lacity.nextrequest.com). Responses posted to the portal were only given to items #7 and #10 by LAPD Discovery Section on July 23, 2019. Following this communication, Records Request #19-3168 was closed.
- On July 24, 2019, Records Request #19-4132 was opened and assigned to LAPD Discovery Section<sup>3</sup>, with the same June 4th Coalition letter uploaded to [lacity.nextrequest.com](https://lacity.nextrequest.com). On September 11, 2019 LAPD posted a response referencing a different CPRA case (Records Request #19-4377 for records pertaining to the LAPD Anti-Terrorism Intelligence Section) in the letter's introduction. On Sept. 11, 2019, Records Request #19-4132 was then closed.

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<sup>1</sup> <https://stoplapdspying.org/demand-letter-to-la-police-commission-following-dismantlement-of-laser-and-chronic-offender-program/>

<sup>2</sup> <https://lacity.nextrequest.com/requests/19-3168>

<sup>3</sup> <https://lacity.nextrequest.com/requests/19-4132>

- Finally, a letter dated Sept. 4th, 2019 from LAPD Police Chief Michel Moore was sent to the Coalition, stating that the BOPC had directed LAPD's Office of Operations to respond to points 2, 3, 4, 5, 6, 12. This letter contained the Department's response to those points, yet the response was never uploaded to either of the Records Requests #19-3168 or #19-4132 in the lacity.nextrequest.com portal.

Separately and preceding the above list of communication from LAPD to the Coalition, on June 13th 2019, the Coalition received a response from the BOPC stating that the Office of Inspector General (OIG) had been instructed to follow up on our request "seeking records related to communications regarding the OIG's report on selected Los Angeles Police Department (LAPD) data-driven policing strategies, as well information reviewed by the OIG for that report."

However, as noted in our original letter dated June 4th, as well as in an email sent to BOPC Executive Director Richard Tefank,<sup>4</sup> the intent was that the BOPC instruct the LAPD - not the OIG - to provide to the community the Department's follow up on matters directly related to the dismantlement and discontinuation of Operation LASER and Chronic Offender Program, including but not limited to the status of funding, consultants' roles, contracts, communications – internal and external, data obtained through these programs including social network analysis, relationship with providers of technologies and related equipment, etc.

Over six months after the original June 4th letter, LAPD has yet to respond fully to our demand for information, pertaining specifically to community concerns regarding a debunked LAPD predictive policing program, Operation LASER.

What follows is a point-by-point listing of the Coalition's original twelve demands for information, along with the LAPD, LAPD Discovery Section, and/or OIG responses to each point, and our resulting response to each.

- 1. Department-wide notification of the dismantlement and discontinuation of Operation LASER, including all operational and enforcement actions and related elements, including LASER Zones and Chronic Offender Bulletins, lists, databases, and Anchor Points.**

No response from LAPD or OIG was provided.

The Coalition notes that item #1 remains unanswered:

It is of great concern to the Stop LAPD Spying Coalition that the LAPD has continued to dismiss and be unaccountable to the community, in appropriately and diligently informing its staff and administration that a program that harmed the community has been dismantled. The

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<sup>4</sup> Email dated July 22nd, subject heading "Follow up to June 4, 2019 Letter"

Coalition demands a response from the department regarding why it has chosen not to act on such a critical communication and how it intends on going forward with department-wide notification regarding the dismantlement and discontinuation of the LASER program.

2. **Operation LASER required LAPD officers to surveil LASER Zones, Chronic Offenders, Anchor points, and also gather information in the form of Field Interview (FI) cards, automatic license plate readers, social network analysis and other forms of surveillance and tracking. We demand to know the status of and plan for the data collected during the start up, implementation, enforcement, and dismantlement phases of Operation LASER and the Chronic Offender program, including:**
  - **To what extent was or is the data obtained through the LASER program being utilized by researchers?**
  - **How the source of this data and the nature with which it was obtained is being considered by researchers and by the academic community?**
  - **What is the plan to cease the use of the data gathered under the implementation of Operation LASER?**

LAPD Response via Email/ Letter to Coalition on Sept 4, 2019:

- *The data has not been used by any researchers. The data was only accessible by Dr. Craig Uchida and limited JSS Inc. staff while LASER was ongoing, but they did not use any of the above-mentioned data types in their analysis (eg, information from ALPRs, SNA, or fracking).*
- *The source of this data, the nature with which it was obtained, has not been considered by researchers and the academic community to this point.*
- *The data used by the LASER program was obtained by existing systems routinely used by the Department prior to the creation of the LASER program. No new methods of data gathering, or data types were created or implemented for the LASER program.*

The Coalition states that item #2 remains unanswered due to the following:

- LAPD and their implementation of LASER did use the surveillance equipment such as ALPRs,<sup>5</sup> SNA,<sup>6</sup> and other traditionally enhanced surveillance tactics<sup>78</sup> to track Chronic Offenders as documented in LAPD's own reports and grant extensions. Therefore, any study or analysis of a chronic offender bulletin or LASER Zones has information

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<sup>5</sup> [Los Angeles, California Smart Policing Initiative Reducing Gun-Related Violence through Operation LASER, October 2012](#) pg 8

<sup>6</sup> [Timeline for Smart Policing: Operation LASER+Los Angeles Police Department October 1, 2016 to December 31, 2017-1REVTimelineforOperationLASER.docx](#)

<sup>7</sup> [Los Angeles, California Smart Policing Initiative Reducing Gun-Related Violence through Operation LASER, October 2012](#) pg 8

<sup>8</sup> [No cost extension 012413.docx](#)

gathered (located on maps, bulletins, spreadsheets) as a result of the LASER program. These data sets (FI Cards, ALPR, SNA) can be accessed by other researchers. How is this data being accounted for and destroyed?

- At least one grant approved by DOJ and City of LA in 2018 describes how researchers from JSS and UCLA will utilize FI card data and other data gathered from 1990-2017: “At a minimum JSS and UCLA will be provided access to calls for service, incident reports, arrests, field interviews, outstanding warrants, and limited personnel information.”<sup>9</sup> Therefore, data gathered as a result of LASER is currently being used by researchers as a datasource. How will data that was gathered as a result of Operation LASER be accounted for and destroyed, including but not limited to FI Card, ALPR, SNA data?
- LAPD claims “no new data types” were implemented, but Chronic Offenders, LASER Zones,<sup>10</sup> and Anchor Points<sup>11</sup> were all newly created objects and categories within Operation LASER, around which additional surveillance and data was then gathered. How will Chronic Offender, LASER Zones, and Anchor point data be accounted for and destroyed?
- LAPD claims that “no new methods of data gathering” took place, but according to grant documentation, “based on the success of Operation LASER (the LAPD’s Smart Policing Initiative), the LAPD established the Community Safety Operations Center (CSOC) in 2016. CSOC serves as a central location for oversight and coordination of activities by the Commander who is in charge of LASER (Commander Gerald Woodyard). CSOC is the department's extension of LASER as it involves the use of data and analytics on a daily basis.”<sup>12</sup> How is the data gathered through CSOC and the analysis conducted there being accounted for and destroyed?

**3. We demand to know the status of the contract(s) with Palantir Corporation and related funding.**

LAPD Response via Email/ Letter Sept 4th, 2019:

- *The Department has discontinued the use of multiple features (eg. Crime Control, and Mission Control Dashboard) of Palantir. As a result, funding for the Department’s contract with Palantir Corporation has been cut by one million dollars. As LASER has been discontinued, Palantir is no longer used in conjunction with it.*

The Coalition states that item #3 remains unanswered:

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<sup>9</sup> Page 45 of pdf: [http://www.lapdpolicecom.lacity.org/120418/BPC\\_18-0394.pdf](http://www.lapdpolicecom.lacity.org/120418/BPC_18-0394.pdf)

<sup>10</sup> [Operation LASER and the Effectiveness of Hotspot Patrol: A Panel Analysis](#)

<sup>11</sup> [LASER.pptx](#)

<sup>12</sup> [Extension June 2018.docx](#)

The demand was regarding the status of LAPD's contract with Palantir Corporation across the whole department, not only limited to use within Operation LASER. How long is the contract for, for what services, and under what terms and conditions?

4. **Justice & Security Strategies (JSS) was the research partner to LAPD and was to serve as the evaluator and the provider of technical assistance for the implementation of Operation LASER, according to documents on the Smart Policing Grant to implement Operation LASER. Given that the LASER program was audited only once in approximately 7 years of operation and was shut down shortly thereafter, we demand to know:**
- a. **The status of the contract with JSS as it relates to LASER and Chronic Offender Bulletin programs, including implementation, operational assessment, reporting, monetary compensation and any other related programmatic relationships with JSS;**
  - b. **How has the performance of JSS as the principle program evaluator of Operation LASER been investigated and documented?**
  - c. **What other LAPD programs are currently being implemented and overseen by JSS, and how are they being evaluated?**

LAPD response via Email/ Letter to Coalition on Sept 4, 2019:

- (a) *The contract for JSS as it relates to LASER ended on March 31st, 2018.*
- (b) *The performance of JSS as the principal program evaluator of Operation LASER was investigated and documented by the OIG.*
- (c) *JSS is not currently implementing any other LAPD programs. The Department has two grants in which JSS is involved as the evaluator and technical assistance provider, respectively: 1) The Los Angeles Crime Gun Intelligence Center. The grant is from the Bureau of Justice Assistance (JSS is the program evaluator). Project Period: 10/01/16 to 9/30/2019 2) "Modernization, Technology, and Policing: Planning and Implementing National Incident-Based Reporting System (NIBRS)." the grant is from the Bureau of Justice Statistics (JSS is the technical assistance provider). Project period: 10/01/2017 to 9/30/19*

The Coalition states that item #4 remains unanswered due to the following:

The Coalition seeks clarification and a response from the department regarding (c): The FY 2018 Strategies for Policing Innovation Program, offered by the DOJ in the amount of \$700k, from program date October 1, 2018 through Sept. 30, 2022. JSS is listed as a "grant research partner" on the Public Safety Committee Report Recommendation.<sup>13</sup>

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<sup>13</sup> [http://clkrep.lacity.org/onlinedocs/2018/18-1219\\_rpt\\_ps\\_2-27-19.rev.pdf](http://clkrep.lacity.org/onlinedocs/2018/18-1219_rpt_ps_2-27-19.rev.pdf)

The DOJ website indicates<sup>14</sup> this grant was awarded in 2018 for LAPD's proposal, "Solving Crime through Innovation." What is the role of JSS in this LAPD policing program, and how are they being evaluated? What other programs is JSS involved in?

**5. According the Smart Policing Grant documents, JSS CEO Dr. Craig D. Uchida served as the principal investigator of Operation LASER, and was responsible for analysis and assessment, for overseeing consultants, for the development of materials, for the design and directing of the gathering, tabulation and interpretation of required data, and writing reports and professional papers. We demand to know:**

- a. How have the actions of Craig Uchida and his role in the approval, expansion, and claims of success of Operation LASER been assessed?**
- b. What is the status and role of Dr. Craig Uchida currently with any other LAPD program?**

LAPD Response via Email/ Letter to Coalition on Sept 4, 2019

*(a): JSS provided annual reports regarding the successes and challenges of LASER in 2012, 2016, 2017, and 2018.*

*(b): There are currently no other programs being overseen by Dr. Craig Uchida. Through JSS, Dr. Uchida is involved in the grants mentioned above.*

The Coalition states that item #5 remains unanswered due to the following:

The Coalition seek clarification and a response from the department regarding why the department did not request any reports or assessment from the years 2012- 2016. The Coalition also seek clarification and a response from the department regarding why the conclusion of these reports authored by Uchida did not reflect the findings of the OIG audit. The Coalition is deeply concerned that a Los Angeles City Department is funding work that is flawed and harmful to the communities and is not seeking any consequences from contractors/consultants/employees such as Craig Uchida. How have the actions of Craig Uchida and his role in the approval, expansion, and claims of "success" of Operation LASER been assessed and accounted for?

**6. Status of remaining funding for LASER and Chronic Offender programs in the current fiscal year.**

LAPD Response via Email/ Letter to Coalition on Sept 4, 2019:

*The grant funding for this program ended in March 2018.*

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<sup>14</sup> <https://external.ojp.usdoj.gov/selector/awardDetail?awardNumber=2018-WY-BX-0002&fiscalYear=2018&applicationNumber=2018-H1661-CA-WY&programOffice=BJA&po=All>

The Coalition notes that this item has been fulfilled.

**7. List of consultants hired to do work in association with Operation LASER, their specific roles, and their current status with the department (LAPD).**

LAPD Response July 23rd, 2019 on lacity.nextrequest.com:

*No responsive documents were found.*

The Coalition states that item #7 remains unanswered due to the following:

Documents regarding Operation LASER's budget<sup>15</sup> and timeline<sup>16</sup> reference the payment of consultants. The Coalition demands information and a response from LAPD regarding who were/are the hired consultants that worked on LASER, and what is their current status with the department?

**8. Any and all communications regarding the dismantlement and findings of the OIG audit with Bureau of Justice Assistance and/or any other local, regional, federal, corporate, public, private sector agencies that have and/or committed current and/or future funding for Operation LASER and Chronic Offender program.**

OIG Response, June 26, 2019:

*The OIG has no records responsive to this request.*

LAPD Response, Aug 27, 2019:

*No responsive records.*

The Coalition acknowledges this response and demands the following:

The Coalition seeks clarification and a response from LAPD in regards to why LAPD in the past has taken quick action to share information about Operation LASER that indicated the program was successful, but has completely failed to share information about the program's shut-down, which happened immediately after the results of a community-demanded audit were made public. Currently, the DOJ lists<sup>17</sup> Operation LASER as an "Accomplishment" of their Strategies for Policing Innovation Program, formerly known as the Smart Policing Initiative, and provides cherry-picked statistics

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<sup>15</sup> [Budget Detail Worksheet page 8: Attachment 3 Budget and Budget Narrative.pdf](#)

<sup>16</sup> [Timeline of Activities for Smart Policing in Los Angeles: Targeting Gun Violence: Attachment 4 Timeline Resumes.pdf](#)

<sup>17</sup> <https://peimiller.wixsite.com/ojpcmp2/spiprogram>

from LAPD, intended to indicate the program was a success. There is no mention of the shut-down of LASER due to questions of ethics, intent to cause harm, and actual harm being committed against communities by LAPD under Operation LASER. Why has LAPD failed to communicate the shut-down of Operation LASER to those agencies that funded the program?

9. **Any and all communications regarding the dismantlement and findings of the OIG audit with other local, regional, federal, corporate, public, private sector agencies that have and/or committed support/partnerships in the implementation, operation, analysis, and/or assessment for Operation LASER and Chronic Offender program; including but not limited to the following:**
- a. **Los Angeles City Attorney**
  - b. **Los Angeles Board of Police Commissioners**
  - c. **Los Angeles Mayor Eric Garcetti**
  - d. **Chicago Police Department,**
  - e. **The Bureau of Justice Assistance**
  - f. **The National Public Safety Partnership**
  - g. **University of Chicago Crime Lab**
  - h. **Los Angeles Department of Building & Safety**
  - i. **Los Angeles Department of Housing and Community Investment**
  - j. **Los Angeles Department of City Planning**

OIG Response, June 26th, 2019:<sup>18</sup>

*The OIG has identified the attached emails in response to your request. The information redacted from the emails is exempt under Sections 6254(c), 6254(k), and 6255 of the CPRA. Section 6254(c) of the CPRA exempts from disclosure personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy; section 6254(k) of the CPRA exempts from disclosure records, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege; Section 6255 of the CPRA exempts from disclosure records, when the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.*

The Coalition acknowledges this response to #9 and demands the following:

The Coalition seek clarification and a response from LAPD as the OIG only provided emails between the OIG and BOPC. Again, it is deeply concerning that LAPD has been

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<sup>18</sup> [OIG June 26, 2019 Response to CPRA Request - Stop LAPD Spying Coalition.pdf](#)

so quick to promote Operation LASER as a successful tactic and program to other agencies, but has completely failed to communicate its shut-down, and why this occurred. As noted by Craig Uchida in an address at the National Forum on Criminal Justice in Long Beach in 2017, the LAPD's Smart Policing "has become a model for other agencies."<sup>19</sup> How has information regarding the dismantlement and findings of the OIG audit been shared with agencies that have committed support and/or partnerships for Operation LASER?

**10. List of agencies and organizations not named in the preceding point, to which LAPD exported elements of Operation LASER, and how they have been notified of the program's status for example West Memphis, Arkansas.**

LAPD Response, July 23, 2019:

*No responsive documents were found.*

The Coalition acknowledges this response to #10 and demands the following:

The Coalition seeks clarification and response from the department regarding why LAPD did not inform West Memphis, Arkansas that the LASER program was dismantled, seeing that the West Memphis Arkansas Police Department (WMPD) asked Dr. Craig Uchida and Officer David Gamero (LAPD) to translate Operation LASER's parameters to a scale that would fit West Memphis, and the team developed WMPD's violence reduction strategy, Operation DETER.<sup>20</sup> We demand to know, why does LAPD not feel it necessary to inform WMPD that Operation LASER was dismantled due to countless procedural and policy violation occurring in its roll-out?

**11. Release of information reviewed by the Office of the Inspector General (OIG) during the office's review of LAPD's Predictive Policing Programs, specifically with regard to which LAPD divisions and officers were committing acts named in the report, including using informal references from officers in categorizing folks as Chronic Offenders, removing the language approved by the City Attorney from the top of the Chronic Offender Bulletins, and other such actions that would further endanger and violate the rights of community members.**

OIG Response, June 26, 2019:<sup>21</sup>

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<sup>19</sup> Slide 23, <https://higherlogicdownload.s3.amazonaws.com/NCJA/c3320104-776e-4e0e-b687-4ffa1fd54e8c/UploadedImages/National%20Forum/2017%20Forum/uchida-effects-of-smart-policing-2017.pdf>

<sup>20</sup> [https://www.nationalpublicsafetypartnership.org/clearinghouse/Content/ResourceDocuments/PSP\\_WestMemphisCaseStudy\\_FINAL.pdf](https://www.nationalpublicsafetypartnership.org/clearinghouse/Content/ResourceDocuments/PSP_WestMemphisCaseStudy_FINAL.pdf)

<sup>21</sup> [OIG June 26, 2019 Response to CPRA Request - Stop LAPD Spying Coalition.pdf](#)

*To the extent this request seeks the LAPD's Chronic Offender Bulletins and/or records contained within the LAPD's Habitual Offender database, such information is exempt from disclosure pursuant to Sections 6254(c), 6254(k), and 6255 of the CPRA. Section 6254(c) of the CPRA exempts from disclosure personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy; section 6254(k) of the CPRA exempts from disclosure records, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege; Section 6255 of the CPRA exempts from disclosure records, when the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.*

The Coalition states that #11 remains unanswered due to the following:

The Coalition seek clarification of this request. The Coalition is seeking to obtain documentation reviewed by the Office of the Inspector General (OIG) during the office's review of LAPD's Data Driven Policing Programs in 2018, specifically with regard to which **"LAPD divisions and officers were committing acts named in the report, including using informal references from officers in categorizing folks as Chronic Offenders, removing the language approved by the City Attorney from the top of the Chronic Offender Bulletins, and other such actions that would further endanger and violate the rights of community members."** The Coalition seeks to clarify that we are not requesting information regarding LAPD's Chronic Offender Bulletins and/or records contained within the LAPD's Habitual Offender Database. The Coalition demands to know the names of the officers who were committing "actions that would further endanger and violate the rights of community members," as described in the OIG report?

12. **The status of the LAPD's use of Social Network Analysis, which officers were trained in using the funding from the Smart Policing Grant, to be used in association with Operation LASER. What did the training entail and who was targeted by this component of the program?**

LAPD Response, Sept 4th, 2019:

*One officer was trained in Social Network Analysis (SNA) after receiving an invite to attend training at the Naval Postgraduate School. Although the officer attended training, the Department never used SNA because LAPD data are not useful for this type of analysis.*

The Coalition states that item #12 remains unanswered due to the following:

The Coalition seeks clarification and response to following documentation that suggests SNA is being used by department:

- Per No cost extension 012413,<sup>22</sup> a no-cost extension document from 2013, “Palantir has been used by Newton Division’s Crime Intelligence Detail (CID) to create Chronic Offender Bulletins, to track vehicles using data from the Automated License Plate Reader, **to examine social networks**, and for other investigative purposes.”
- Per a Grant Management Report<sup>23</sup> submitted to BJA by Craig Uchida on behalf of LAPD for the reporting period July 1st to December 31st, 2011, “Operation LASER uses computer mapping and spatial analytics, **social network analysis**, and definitions of hotspots, to select targets (gangs and gang members) and areas for extraction of suspects and offenders involved in gun and gang-related crimes.”
- Per a Grant Management Report<sup>24</sup> submitted to BJA by Craig Uchida on behalf of LAPD for the reporting period January 1st, 2016 - June 30, 2016, “We requested training and technical assistance (TTA) on **Social Network Analysis**. On July 12, Professor Andrew Fox and Major Joe McHale provided TTA to the department.”
- Per the LAPD’s “Timeline for Smart Policing: Operation LASER+” document<sup>25</sup> dated October 1, 2016 to December 31, 2017:
  - Notes that from April – December 2017, “All LASER+ Bureaus, Divisions, CIDs, and the LAPD Research Partner (Justice & Security Strategies/JSS) will engage in the following activities”... one of which is “**Use social network analysis** to determine the linkages between and among gangs and gang members across division and bureau boundaries.”
  - “The BJA Training and Technical Assistance provider, CNA will provide training on ArcGIS, **social network analysis** and other topics for members of the LASER+ teams.”
- We demand to know, what did the training entail, and who was targeted by this (SNA) component of the program?

We expect a response to these items listed above and the following demands by Tuesday, October 22nd. Should you have any questions, please email us at [stoplapdspying@gmail.com](mailto:stoplapdspying@gmail.com).

We demand:

- (1) CPRA #19-4132 be re-opened,
- (2) The supporting documents for CPRA #19-4132 be uploaded to the NextRequest website,
- (3) A written response from LAPD regarding items 1, 8, 9, and 10.

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<sup>22</sup> [No cost extension 012413.docx](#)

<sup>23</sup> [Jul-Dec 2011 PMT.pdf](#)

<sup>24</sup> [Jan-Jun 2016 PMT.pdf](#)

<sup>25</sup> [1 REV Timeline for Operation LASER.docx](#)

Sincerely,

A handwritten signature in black ink, appearing to read "H. Khan", written in a cursive style.

Hamid Khan

Stop LAPD Spying Coalition

CC:

Los Angeles Board of Police Commissioners

Richard Tefank - Executive Director, Los Angeles Police Commission

Mark Smith - Inspector General, Los Angeles