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April 8, 2022

Mr. Kirk Bunch, Law Enforcement Consultant II
Commission on POST
860 Stillwater Road, Ste. 100
West Sacramento, CA 95605-1630

**Re: Written Comments Regarding the Addendum -Initial
Statement of Reasons (AISR) to the Rulemaking File
Amending Commission Regulation 1005(a) Minimum
Standards for Training for District Attorney Investigators
(DAIs) and Request for Public Hearing (Gov. Code 11346.8)**

Dear Mr. Bunch,

On behalf of the Los Angeles County Professional Peace Officers Association (PPOA), which is the certified majority representative of all sergeants and lieutenants employed by the Los Angeles County District Attorney's Bureau of Investigation, PPOA strenuously rejects the (AISR) as it adds absolutely no justification for its proposed revisions.

The beginning of the AISR immediately raises concerns as the third paragraph of page-one of the four-page AISR contains an incorrect date of an October 2020 Commission meeting and then states during the (incorrect date) public comment period, "an individual identified inconsistencies within Commission Regulation 1005 related to the training requirements for DAIs." PPOA respectfully requests that POST provides a corrected and accurate AISR that provides the public and law enforcement stakeholders an opportunity to review the properly identified transcript of the correct October 2020 Commission meeting.

Page two (2) of the AISR adds two paragraphs of unnecessary and irrelevant information pertaining to the POST Commission and the POST Commissioners. Why wasn't this information documented in the Initial Statement of Reasons (ISR) and how does this information provide any justification for proposed revisions? PPOA believes the true subject matter experts are the 48 of 51 California District Attorney Bureau Chiefs who are opposed to amending the minimum standards for training for DAIs. These

stakeholders have requested, since June of 2021, to be allowed to work collaboratively with POST on this issue and yet have been totally disregarded by the POST Commission.

The last paragraph of page three (3) references that the DAI position was reviewed by POST in **1983**. Although in 1983, POST concluded that the job of a DAI is different from that of a Patrol Officer, POST also concluded that the Basic Course was more in line with the duties of a DAI because DAIs perform more general criminal investigations. It was during these 1983 hearings that POST determined the Specialized Investigator Basic Course was insufficient to meet the needs of the DAI position. PPOA questions the omittance of this particularly vital information in the AISR.

Despite the latest attempt by POST to add justification and provide further information on amending the Commission Regulation 1005(a), there remains no necessity for the amendment as the Commission continues to lack substantial evidence to justify lowering the training requirement for DAIs.

Sincerely,

A handwritten signature in blue ink, appearing to read "Wayne J. Quint, Jr.", written in a cursive style.

Wayne J. Quint, Jr.
Executive Director
Los Angeles County Professional
Peace Officers' Association