



CALIFORNIA COALITION OF LAW ENFORCEMENT ASSOCIATIONS
PROUDLY REPRESENTING OVER 150,000 PEACE OFFICERS
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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
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,

The California Coalition of Law Enforcement Associations (CCLEA) is the state's largest law enforcement organization. The CCLEA represents more than 40 "rank and file" law enforcement associations and 150,000 peace officers. Please accept this written correspondence as our formal objection and strong opposition to the Addendum-Initial Statement of Reasons that proposes to amend Commission Regulation 1005(a), Minimum Standards for Training for DAIs.

The CCLEA also requests a Public Hearing on this proposed addition to the Rulemaking File that will be likely submitted to the Office of Administrative Law (OAL) sometime after the public inspection and written comment period, which is now through April 11, 2022.

The Rulemaking File that was submitted by POST to the OAL in the fall of 2021, should have the CCLEA's August 26, 2021 written opposition to the then proposed Initial Statement of Reasons (ISR). CCLEA fails to recognize any additional information contained in the Addendum- Initial Statement of Reasons that justifies the necessity to amend Commission Regulation 1005(a) Minimum Standards for Training for District Attorney Investigators.

The CCLEA either has associations that directly represent DAIs as their certified bargaining units or associations whose law enforcement members work with DAIs when investigative prosecution of suspects occurs during the judicial process. Neither the DAIs nor law enforcement association members want to see the lowering of minimum training qualifications change for the DAI. It is quite concerning to the CCLEA and unacceptable that the POST Commission continues to attempt to move forward on altering the qualifications for DAIs without seeking input from "rank and file" law enforcement associations and other stakeholders that will be unnecessarily impacted.

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Again, the CCLEA respectfully believes that the POST Commission could and should develop a training course for those who have completed the Specialized Investigators Course (SIBC) that would allow them to upgrade their training certification from "Specialized Basic" to "Basic." This course of action would not only allow the candidate to work for a California District Attorney's Office but allow them to lateral to any public safety agency employing peace officers throughout California including police and sheriff's departments. This action would greatly benefit the peace officer by providing them with the highest level of training certification by POST. The CCLEA believes this would increase peace officer standards over the Commission's recommended regulatory amendment to lower current standards.

Very truly yours,

BOARD OF DIRECTORS
California Coalition of Law Enforcement Associations



CRAIG D. LALLY
President

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