

September 24, 2024

Board of State and Community Corrections
2590 Venture Oaks Way
Sacramento, CA 95833

Re: Unsafe Conditions at Los Padrinos Juvenile Hall

Dear Chair Penner and Board Members,

We write to you with an urgent plea to protect young people incarcerated inside Los Padrinos Juvenile Hall who continue to suffer unsafe conditions due to the Los Angeles (LA) County Probation Department's inability to adequately staff this facility. In the month of July, [1 out of 5 shifts at Los Padrinos failed to meet minimum standards](#) despite the desperate, extreme measures deployed by the probation department to come into compliance with staffing.

This Board is well-versed in the long and consistent pattern of LA County cycling in and out of compliance across their juvenile halls. Los Padrinos opened on July 19, 2023. Barely a month later, on August 18, 2023, BSCC staff notified LA County of numerous violations of minimum regulations, many stemming from lack of adequate staffing. LA County was, predictably, unable to implement their corrective action plan and Los Padrinos remained out of compliance with minimum regulations through February 15, 2024 when this Board found the hall unsuitable. LA County subsequently deployed extreme but unsustainable measures to come into basic compliance with staffing ratios during the following 60-day window. At your April 11, 2024 meeting, this Board struggled with the question of finding them suitable to avoid closure. With assurances of a fast-track process for future violations, this Board ultimately found Los Padrinos suitable in April. Unsurprisingly, Los Padrinos was out of compliance with programming by the end of June, and by August 12, 2024, Los Padrinos was once again out of compliance due to inadequate staffing.

When faced with Los Padrinos' suitability on April 11, 2024, this Board appropriately expressed skepticism regarding LA County's ability to sustain compliance with minimum regulations. To help assuage these concerns, BSCC counsel laid out two paths for you, the first of which was the standard path under Welfare and Institutions Code Section 209, subdivision (d) which would trigger a months-long process of inspections, corrective action plans, and suitability determinations. BSCC counsel also shared a second possibility; the Board could convene and declare the facility unsuitable and decline re-inspection in the following 60-day window.¹ **We strongly urge you to take this second path as soon as possible, but no later than at your October meeting, given the recurring and serious nature of LA County's violations.**

During your April meeting, Chair Penner surmised the following: *"We've had a lot of discussions about being fearful of what could come next and counsel has given us a roadmap . . . Understanding the board would be primed and ready for that course of action should we need it."*² Chair Penner also stated: *"We are in very very serious times, we do not want young people to be in peril. We have to work with the evidence and outcome we*

¹ https://youtu.be/07zCZfFDPgk?si=VlqIHdUxKQVG_Jxg (timestamp: 4:48:44)

² <https://youtu.be/07zCZfFDPgk?si=e3U5eHpJnVYrsgjB&t=17482> (timestamp 4:51:22)

are faced with at this time. And that may change.”³ The change referenced by Chair Penner is here. The evidence shows that LA County Probation cannot meet its staffing obligations yet again at Los Padrinos. Young people are in peril, every single day. It is time to make good on your promises from April.

As another Board member, Sheriff Taylor, presciently shared at the April 11, 2024 meeting: “*I share the concern . . . about this constant ebb and flow of coming into compliance and out of compliance . . . I take comfort in knowing that we would have the option of not re-starting this whole process again . . . especially if it comes back to these things that they have already been found unsuitable.*”⁴ This Board voted to find Los Padrinos suitable in April because of assurances that a future process could be fast-tracked, and correctly noted this was especially important in cases of violations that have been part of LA County’s history of non-compliance. Inadequate staffing is a common thread across the years-long cycle for LA County and even the most extreme and desperate measures have failed, once again.

Los Padrinos has been open for nearly 14 months; it has been out of compliance with one or more of the minimum standards for 10 of those months. Youth who are currently in Los Padrinos and have been there since its opening have spent 70% (and counting) of their time in an out-of-compliance facility. Not even 24 hours after this Board cautiously found Los Padrinos suitable to house youth, the Los Angeles Times released a [graphic video](#) depicting LA County Probation officers encouraging and rewarding a group of youth in their custody as they assaulted another young person. Amidst allegations of gladiator-style fight clubs run by probation officers in Los Padrinos, this video should have led to Los Padrinos being shut down much earlier.

We call on this Board to stand by the words you used to justify your prior suitability determination for Los Padrinos. Stand by your promise to act swiftly, and not re-start a months-long process, using the path your counsel has laid out to protect youth inside Los Padrinos. The integrity of this Board is on the line, and the integrity of your entire inspection process is on the line. You must find Los Padrinos unsuitable in October and decline to re-inspect in the 60-day window thereafter.

Sincerely,

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³ <https://youtu.be/07zCZfFDPgk?si=z22iStEJyXrNYDfJ&t=17538> (timestamp 4:52:18)

⁴ <https://youtu.be/07zCZfFDPgk?si=DwTefgPuAPmkC3VG&t=17222> (timestamp 4:47:42)

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