King County

Office of Law Enforcement Oversight (OLEO)

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TO: Patti Cole-Tindall, Sheriff, King County Sheriff's Office

CC: Geoffrey Thomas, Chief of Staff, King County Sheriff's Office
Kimberly Petty, Professional Standards Manager, King County Sheriff's Office
Joseph Engman, Policy Development Specialist, King County Sheriff's Office
Michael White, Deputy Chief of Staff, King County Executive Office

FR: Tamer Abouzeid, Director, Office of Law Enforcement Oversight
Katy Kirschner, Deputy Director, Office of Law Enforcement Oversight
Lea Hunter, Senior Policy Analyst, Office of Law Enforcement Oversight
Molly Webster, Policy Analyst, Office of Law Enforcement Oversight
Simrit Hans, Policy Analyst, Office of Law Enforcement Oversight
The Arc of King County
Eastside for All
Look2Justice
People Power Washington
Urban Family

RE: Supporting Safe and Accessible Public Assemblies: Updating the King County Sheriff's Office's Crowd Management Policies and Procedures (General Orders Manual 11.10.000 Public Order and Civil Disturbances and Rapid Deployment Force Standard Operating Procedures)

At the beginning of 2025, the King County Sheriff's Office (Sheriff's Office) developed new policies on public order and civil disturbances which govern practices for crowd management and control. These include General Orders Manual (GOM) 11.10.000 in addition to Standard Operating Procedures (SOP) for its newly formed Rapid Deployment Force (RDF). The RDF is a unit of Sheriff's Office deputies trained in crowd management tactics who could be deployed to assist when necessary in crowd management situations such as protests, large sporting events, and other events where large crowds may be present. **This memo outlines policy recommendations to improve Sheriff's Office policy and practices regarding management of crowds developed by the Office of Law Enforcement Oversight (OLEO) in partnership with community organizations (read more about OLEO's community-guided policy review process here). These recommendations build upon the Sheriff's Office's recent updates to their public order policies to improve protections for the right of public assembly; promote public safety; and improve transparency, trust, and communication between the Sheriff's Office and King County residents.**

Recommendations

1. Integrate all nonsensitive information from the non-public Standard Operating Procedures on the Rapid Deployment Force into the public-facing policy on Public Order and Civil Disturbances to facilitate transparency and accountability.

Section 1: Defining and narrowing the role of the Rapid Deployment Force and the Dialogue Team in crowd management

2. Establish clear thresholds for the staging and deployment of the Rapid Deployment Force to ensure the unit is only used when appropriate and necessary.
3. Codify the role of the Dialogue Team throughout the stages of crowd management, intervention, and control to clarify their roles and support their ability to facilitate public assembly.
4. Ensure the policy explicitly affirms and prioritizes the protection and facilitation of First Amendment rights and all Sheriff's Office personnel who may have a role in crowd management receive robust scenario-based training in relevant case law, de-escalation, and peer intervention training, with a special focus on expanding communication skills for the Dialogue Team.
5. Expand definitions and terminology to clarify the Sheriff's Office procedures for large-scale events.
6. Require every effort be made to communicate with event organizers prior to planned events and incorporate training and pre-deployment planning to provide proper accommodations for people with disabilities and people with Limited English Proficiency.

Section 2: Revising approved tactics for use in crowd management

7. Explicitly adopt the principles of proportionality and differentiation throughout the Sheriff's Office crowd management practices to ensure all tactics used are tailored to each circumstance and avoid curbing rights of lawful assembly.
8. Restrict the use of force in crowd management situations to reflect best practices and reduce the risk of harm to event participants and unintended targets.
9. Impose additional restrictions on the use of less lethal impact munitions due to the risk of serious bodily harm to event participants and others.
10. Specify what conditions necessitate crowd dispersal and how announcements of law enforcement action to disperse a crowd shall be made to minimize deputy discretion and promote public safety.
11. Require that mass arrests be used only as a last resort.
12. Require that Sheriff's Office personnel allow all injured persons access to medical aid, regardless of how the injury was sustained, and follow the post-force medical aid policy.
13. Prohibit "kettling" and other restrictive containment tactics except when the Incident Commander has authorized mass arrests, issued clear warnings communicating intent to contain, and provided sufficient opportunity to comply. Kettling should only be used against those for whom there is individualized probable cause to effectuate arrests.

14. Prohibit Sheriff's Office personnel from collaborating with vigilantes, armed groups, or other non-law enforcement groups for crowd management purposes (e.g., crowd management tactics, uses of force, arrests).

Section 3: Ensuring transparency and accountability throughout the Sheriff's Office response to crowd situations

15. Require that Sheriff's Office personnel participating in all levels of crowd management wear and utilize body-worn cameras to promote transparency and accountability.
16. Notify OLEO of Rapid Deployment Force staging and deployment to support mutual goals of transparency and building community trust.
17. Require the Incident Commander to complete a thorough After-Action report and share it with OLEO to improve communication and transparency.
18. Include community stakeholders in the post-event review process to improve public relationships and promote transparency.

Background

The Sheriff's Office has recognized that large-scale events from political demonstrations to the 2026 World Cup matches in King County require advance planning and updated policies and standards to clarify the Sheriff's Office's role in facilitating public assembly and preserving public safety when large crowds are gathered. OLEO applauds the Sheriff's Office for initiating reforms to the department's previously outdated crowd management policies and taking necessary steps to ensure the department is prepared for upcoming events where large crowds may be present. The Sheriff's Office has engaged in significant planning, sought nationally recognized training and resources to inform their new crowd management strategies, and invited OLEO into the planning and development process for the new RDF.

The RDF is a newly formed unit within the Sheriff's Office that "is responsible for maintaining public order at both planned and unplanned public events, or spontaneous violent civil unrest involving a threat to public safety which would otherwise exceed the capabilities of traditional law enforcement first response." OLEO's understanding is that the RDF is a unit of more than 40 deputies trained in crowd management tactics. Training for the RDF was adapted from tactics used by the Los Angeles Police Department, and following the Los Angeles Police Department model, the RDF is organized into squads that can be deployed to assist in crowd management. All members of the unit are equipped

with body armor, helmets, batons, duty firearms, Taser EW, and OC spray (also known as pepper spray)—see pictured uniforms. Each squad includes two "less-lethal operators," who are armed with 40mm less lethal impact munitions.

The Sheriff's Office has incorporated elements of national best practices into new crowd management protocols including the creation and training of a Dialogue Team whose stated role is "to facilitate communication and understanding between [crowd] participants and department representatives. Their aim is to engage in conversation, listen to concerns, and attempt to de-escalate tense situations to maintain a peaceful event and build trust between the community and the Sheriff's Office" (GOM 11.10.115).

Earlier this year, the Sheriff's Office rewrote their policies to develop safer and more effective practices for crowd management.[1] While OLEO recognizes the Sheriff's Office's efforts, additional work remains. The current policy language lacks transparency and clarity, and could be improved to better reflect best practices. It is crucial that a comprehensive policy is available for public consumption and the role of the RDF is narrowly tailored to ensure the unit is deployed only when appropriate and necessary. Elements of the following recommendations align with principles and intentions that the Sheriff's Office has shared with OLEO; however, it is necessary that those principles be reflected fully in policy language in service of transparency and accountability.

Review process

OLEO joined parts of the planning process for the creation of the RDF, including attending planning meetings, initial trainings, and posing questions during the policy drafting process. Once the Sheriff's Office published the new policies, OLEO conducted a community-guided rapid response review.[a] The resulting recommendations have been reviewed and approved by OLEO's community partners: the Arc of King County, Eastside for All, Look2Justice, People Power Washington, and Urban Family.

Initial policy changes

During the initial policy drafting process, OLEO raised some questions which resulted in changes to the published policy. Changes included adding a prohibition on the use of extreme noise amplification as a tool for crowd dispersal, clarifying language on "riot declaration" to better align

[a] For details of this process, see OLEO's Community Guidance Framework for Policy Reviews: http://kingcounty.gov/oleo/community-guidance-pdf.

with RCW 9A.84.020, and adding language requiring reasonable action to accommodate people with Limited English Proficiency when issuing an order to disperse within the current Public Order and Civil Disturbances policy (GOM 11.10.000).

Recommendations

RECOMMENDATION 1.

Integrate all nonsensitive information from the non-public Standard Operating Procedures on the Rapid Deployment Force into the public-facing policy on Public Order and Civil Disturbances to facilitate transparency and accountability.

Given the significant public interest in issues of assembly, free speech, and public order policing, community members have a right to access the relevant Sheriff's Office policies. However, the existing public-facing policy on Public Order and Civil Disturbances (GOM 11.10.000) does not provide sufficient information for the public to operate safely at large-scale events or to fully understand the department's standards for the conduct of its deputies. Instead, most of the substantive information regarding crowd management policies is currently contained in the RDF SOP, an internal document not readily available to the public.

OLEO recommends the Sheriff's Office develop a more comprehensive draft of the publicly available policy by integrating all nonsensitive information currently outlined in the RDF SOP into GOM 11.10.000. Policies should be transparent and publicly available, giving community members access to information about how law enforcement operates and the impacts of policing on their communities.[2] While the RDF SOP can and should outline specific administrative procedures, any language only present in the RDF SOP should only be excluded from the policy for a clear reason such as being operationally sensitive or purely procedural.[3]

OLEO recommends that the policy should be expanded to include the following sections from the current RDF SOP in addition to the information currently in GOM 11.10.000:

- Core Principles,
- Rapid Deployment Team Structure,
- Dialogue Team,
- Authorized RDF Use and Deployment,
- Incident Action Plan,
- General Guidelines for Planned Events (At Least 24-hour Notice),
- General Guidelines for Spontaneous Events (Less than 24-hour Notice),
- Communication with the Crowd,
- Crowd Stewardship,
- Crowd Intervention,
- Crowd Control,
- Use of Force,
- Member Identification During Events, and
- Coordination with Other Agencies.

Unless otherwise noted, OLEO's suggested policy language, inclusions, and edits throughout this memo are intended to be included in the public-facing policy—GOM 11.10.000 Public Order and Civil Disturbances— that integrates the RDF SOP.

The following recommendations are organized into three categories:

1. Defining and narrowing the role of the Rapid Deployment Force and the Dialogue Team in crowd management,
2. Revising approved tactics for use in crowd management, and
3. Ensuring transparency and accountability throughout the Sheriff's Office response to crowd situations.

Section 1: Defining and narrowing the role of the Rapid Deployment Force and the Dialogue Team in crowd management

RECOMMENDATION 2.

Establish clear thresholds for the staging and deployment of the Rapid Deployment Force to ensure the unit is only used when appropriate and necessary.

Currently, the policy language in GOM 11.10.000 and RDF SOP do not establish a clear threshold of crowd behavior or other explicit conditions that would necessitate deployment of the RDF. While the RDF SOP identifies the authorized uses of the RDF and the types of events that the unit could be deployed to, the policy language should clarify specific conditions that would necessitate RDF staging and deployment, as well as when, or if, the Dialogue Team or a portion of the RDF would be deployed rather than the full unit.

2.1 Remove "encampment sweeps" as an authorized use of the Rapid Deployment Force. Currently the RDF SOP includes "encampment sweeps" as an authorized use. The RDF's skillset is ill-suited to conducting encampment sweeps. Mishandling of this delicate task risks entrenching mistrust between law enforcement and unhoused communities who are disproportionately victims of violence and crime.[4]

Sweeps are ineffective at reducing homelessness, increase rates of arrest, lengthen the amount of time people live without a home, and cause adverse health effects.[5] Although previously ruled unconstitutional, cruel, and unusual,[6] in 2024, the U.S. Supreme Court ruled that cities can ban individuals from sleeping and camping in public places.[7] While the King County Superior Court has ruled that the Sheriff's Office has the legal authority to conduct encampment sweeps,[8] it is OLEO's position that the Sheriff's Office should not undertake this task.

2.2 Add "civil disturbances" as an authorized use of the Rapid Deployment Force. Currently, the RDF SOP authorizes that the RDF be used at "large all-hazards risks and events" and "large-scale special events" among other situations. Given that GOM 11.10.000 is explicitly focused on civil disturbances, OLEO recommends that "civil disturbance" is added to the list of authorized uses of the RDF. While civil disturbances could be considered "large-scale special events," it would be beneficial to utilize explicit and clear policy language.

RECOMMENDATION 3.

Codify the role of the Dialogue Team throughout the stages of crowd management, intervention, and control to clarify their roles and support their ability to facilitate public assembly.

The Dialogue Team is a unit of Sheriff's Office deputies who specialize in communication and de-escalation with crowd members. Across the country, similar teams have transformed how law enforcement agencies respond to large-scale events by working with crowd participants to facilitate public assembly, unlike traditional command and control approaches to public order policing.[9] Through the creation of a Dialogue Team, the Sheriff's Office demonstrates its commitment to build positive and productive relationships with community members and facilitation of safe and robust exercise of First Amendment rights during planned response to large-scale events. Members of the Sheriff's Office Dialogue Team have attended the 40-hour Dialogue Police training course sponsored by the Columbus Division of Police and instructed by Professor Clifford Stott who is considered an expert in crowd psychology, public order policing, and the dynamics of protest and conflict.

The current RDF SOP includes a section on the Dialogue Team; however, OLEO recommends that specifications for the role of the Dialogue Team be integrated throughout the policy for all phases of the Sheriff's Office response to large-scale events (stewardship, intervention, and control), including contact with event organizers before planned events, intentional and directed contact with participants during an event, and relationship management after an event.

3.1 Incorporate the Dialogue Team throughout the policy to emphasize the prioritization of de-escalation and voluntary cooperation throughout an event.

3.2 Mandate the use of the Dialogue Team for assemblies, events, and other crowd management situations where law enforcement presence has been deemed necessary, prior to the use of higher levels of law enforcement presence, including deployment of the Rapid Deployment Force, unless there is a significant and widespread risk to public safety. In other jurisdictions, Dialogue Teams are utilized to de-escalate events, thereby preventing the need for a more serious law enforcement response.[10] OLEO recommends that the policy language explicitly call for the Dialogue Team to respond to all events requiring law enforcement presence, prior to the use of the RDF.

3.3 Codify Dialogue Team uniform requirements. To allow community members to quickly and easily identify Dialogue Team members, policy language and public-facing materials should specify what Dialogue Team members will wear at events to differentiate them from RDF members.

RECOMMENDATION 4.

Ensure the policy explicitly affirms and prioritizes the protection and facilitation of First Amendment rights and all Sherrif's Office personnel who may have a role in crowd management receive robust scenario-based training in relevant case law, de-escalation, and

peer intervention training, with a special focus on expanding communication skills for the Dialogue Team.

When responding to large-scale events and civil disturbances, it is any law enforcement agency's duty to promote public safety while upholding the public's First Amendment rights[11] including Freedom of Public Assembly and Freedom of the Press. While the Sheriff's Office has been outspoken in their commitment to centering First Amendment protection, enshrining those values in the policy is an important signal to the public of the Sheriff's Office's intention and principles and a clear standard for holding itself accountable. Additionally, the policy currently lacks protocols to coordinate and facilitate media reporting from large-scale events.

4.1 Affirm the full scope of the duty to facilitate First Amendment rights within policy. Currently, the policy and RDF SOP state that the Sheriff's Office "respects the rights of people to peaceably assemble" (GOM 11.10.115) and the RDF SOP adds respecting individuals' ability to "exercise their freedom of speech." Many peer agency policies clarify that First Amendment demonstrations can include, but are not limited to, assemblies, rallies, parades, marches, picket lines, or other similar gatherings conducted for the purpose of expressing political, social, or religious views. OLEO recommends that GOM 11.10.000 is updated to include language that defines and specifies the rights protected by the First Amendment, adapted from the Chicago Police Department's directives (effective August 2024):[12]

   a. The right to hold any opinion, idea, or belief;
   b. The right to communicate or receive opinions, ideas, beliefs, or information;
   c. The right to associate and to assemble with others for the purpose of expressing, receiving, or exchanging ideas, beliefs, or information;
   d. The right to advocate for ideas or beliefs, including the right to advocate for an alternative system of government and to advocate for civil disobedience;
   e. The right to petition the government or governmental officials for redress of grievances;
   f. The right to associate for the purpose of seeking and giving legal advice as well as advancing litigation;
   g. The right to observe and record events, including approaching individuals to ask questions for news gathering purposes, and disseminating information.

4.2 Clarify policy requirements and specific procedures for interaction with media outlets. The current RDF SOP includes a section on "Media and Legal Observers," but GOM 11.10.000 contains no media guidelines. Media outlets play an important role in large-scale events, keeping the public informed and increasing transparency.[13] OLEO recommends that the Sheriff's Office develop a detailed plan in policy for coordinating with media outlets during large-scale events to specify:

   a. Which Sheriff's Office personnel are responsible for maintaining reliable and consistent contact with media outlets before and during an event;
   b. Where media can be staged during an event;
      i. The media staging area should be created at a safe distance from the event where the event remains in full view. Members of the media can leave the

staging area (for example, joining the crowd to capture photographs or interview participants); however, establishing this staging area provides a clear and singular location where the Sheriff's Office can provide updates to members of the media.

c. How frequently Sheriff's Office personnel should communicate with media outlets during events;
d. What information (road closures, participant activity, and other nonsensitive information) should be shared with outlets prior to a planned event; and
e. Any special considerations for members of the media at large-scale events, including expectations and guidelines for response to orders to disperse.

Any additions to the RDF SOP alone (not in the public-facing policy) should be strictly procedural or tactically-sensitive steps regarding communication with media outlets.[b]

4.3 Require specialized scenario-based First Amendment and crowd management training. While the RDF SOP and GOM 11.10.160 mention crowd management and control training, policy language should explicitly require specific training on the First Amendment, crowd de-escalation, and peer intervention to align with best practices.[14]

Crowd management training should include:

a. Mitigating issues of racial bias in protest policing.[15]
b. Practical guidance for managing counterdemonstration groups.
c. Scenario-based training and hands-on practice to ensure language accessibility and accommodations for people with disabilities in crowd management situations.
    i. This includes, but is not limited to, using specialized communication, tactics, and accommodations for wheelchair users and people with other physical or intellectual and developmental disabilities during dispersal orders or arrests.
d. First Amendment training on constitutionally protected activity, and guidance for de-escalating hate speech.[16]
e. Guidance for maintaining officer identification and agency policies around the use of differing levels of gear during demonstrations.

These training requirements should apply to members of the RDF as well as the Dialogue Team.

RECOMMENDATION 5.

Expand definitions and terminology to clarify the Sheriff's Office procedures for large-scale events.

5.1 Add and update definitions for "Civil Disturbance," "Demonstration," "Media," and "Unlawful Assembly". The following terms should be defined for precision and clarity in GOM 11.10.00:

[b] For guidance on what information OLEO recommends be included in the GOM and RDF SOP, please refer to Recommendation 1.

a. Replace the current definition of "Civil Disturbance" with the following from Stanford Law School: "an assembly where three or more persons engage in acts of violence resulting in an immediate threat to public safety or order in the form of imminent threats of widespread violence, injury to persons, or substantial destruction of property."[17] This language improves upon the previous definition by removing the terms "unlawful assembly" and "riot" which are two distinct concepts and should not be confused or conflated with a "civil disturbance."
b. Adopt the following "Demonstration" definition from the International Association of Chiefs of Police's (IACP) model policy: "A lawful assembly of persons organized primarily to engage in free-speech activity. These may be scheduled events that allow for law enforcement planning. They include, but are not limited to, marches, protests, and other assemblies intended to attract attention. Lawful demonstrations can devolve into civil disturbances that necessitate enforcement action."[18]
c. Define "Media" to be consistent with RCW 5.68.010 where "media" means any person who is an employee, agent, or independent contractor of any "newspaper, magazine or other periodical, book publisher, news agency, wire service, radio or television station or network, cable or satellite station or network, or audio or audiovisual production company, or any entity that is in the regular business of news gathering and disseminating news or information to the public by any means, including, but not limited to, print, broadcast, photographic, mechanical, internet, or electronic distribution."[19]
d. Define "Unlawful Assembly" to describe a "Civil Disturbance" after a dispersal order has been issued to make clear that an assembly can only be deemed to be unlawful when it has been declared to be so by a relevant authority such as the Sheriff's Office.

5.2 Differentiate use of the terms "Civil Disturbance," "Demonstration," "Unlawful Assembly," and "Riot." Currently, the RDF SOP and policy on Public Order and Civil Disturbances use these terms frequently and interchangeably which confuses their meanings. The policy should be updated with "Civil Disturbance," "Demonstration," and "Unlawful Assembly" used as defined in Recommendation 5.1. Use of the term "Riot" should be limited to only those places where required in RCW (i.e., for the purposes of using tear gas). OLEO recommends replacing references to "riot declaration" in GOM 11.10.110 and the RDF SOP with a "declaration of an unlawful assembly" or "order to disperse."

5.3 Define and clarify the use of "pepper balls" to align with the policy on Less Lethal Weapons (GOM 6.03.000). Currently, the RDF SOP categorizes "pepper balls" as "chemical incapacitants," while GOM 6.03.000 on Less Lethal Weapons refers to pepper balls as "pepper impact projectile weapons."[20] The policy and the RDF SOP should be updated to:
a. Use the term "pepper impact projectile weapons" for consistency with GOM 6.03.000;
b. Explain that "pepper impact projectile weapons" are both chemical incapacitants and less lethal impact munitions; and
c. Establish that the requirements and limitations of using chemical incapacitants and less lethal impact munitions apply to use of "pepper impact projectile weapons."

RECOMMENDATION 6.

Require every effort be made to communicate with event organizers prior to planned events and incorporate training and pre-deployment planning to provide proper accommodations for people with disabilities and people with Limited English Proficiency.

6.1 Require Sheriff's Office personnel to make every effort to contact organizers prior to a planned event to facilitate coordination and relationship-building with event participants. Currently, the RDF SOP states that the Sheriff's Office shall make "reasonable efforts" to contact the known event organizers for planning. OLEO recommends replacing this language in the policy with the IACP model policy language, which requires that "every effort" be made to contact the event organizers to gather the necessary information for planning.[21]

6.2 Require the Sheriff's Office to receive scenario-based training and provide reasonable accommodation for people with disabilities and people with Limited English Proficiency in its crowd communications. All members of the RDF and Dialogue Team should receive scenario-based training for interacting with disabled populations including those who use Alternative and Augmentative Communication devices and American Sign Language, as well as Limited English Proficiency crowds at large-scale events. If there is reason to believe that a significant portion of the crowd speaks a language other than English, the Sheriff's Office must translate announcements, warnings, and orders so that individuals in the crowd have sufficient opportunity to participate in an event safely and lawfully. Dispersal orders may need to be communicated using written signage or pre-recorded messages in multiple languages.

Section 2: Revising approved tactics for use in crowd management

RECOMMENDATION 7.

Explicitly adopt the principles of proportionality and differentiation throughout the Sheriff's Office crowd management practices to ensure all tactics used are tailored to each circumstance and avoid curbing rights of lawful assembly.

In a crowd management situation, law enforcement's main goals are to protect public safety and facilitate the right of the crowd to assemble. In service of these goals, it is considered best practice for any enforcement actions to be targeted to the unlawful behavior of an individual or individuals in a crowd, rather than taking enforcement action against an entire crowd (e.g., ordering a full crowd to disperse).[22]

7.1 Incorporate principles of differentiation and proportionality throughout crowd management policy, training, and tactical decision making. The IACP, the Police Executive Research Forum, and others agree that policies should require public order units to identify and isolate, or differentiate, individual law breakers when policing large-scale events to avoid escalating tension between the broader crowd and law enforcement.[23] In other words, deputies should address individuals' behaviors, rather than taking enforcement action against a whole crowd, to ensure other participants can continue exercising their rights. The current RDF SOP includes some reference to differentiation; however, OLEO

recommends that the Sheriff's Office add explicit language throughout its policies clarifying that Sheriff's Office personnel will practice differentiation and prioritize facilitation of peaceful assembly throughout their response at large-scale events.

Deputies should reduce the scope of their incursion into a crowd to tactics that are necessary and proportional. When use of force or detention is authorized, related tactics should target only the individual(s) engaged in unlawful activity, and the unlawful activity must not be attributed to the assembly as a whole. Minor violations of the law, such as littering, sign posting, minor damage to property, or violations of a permit or curfew, can be addressed after an event.[24] Minor violations should not be used as the sole basis to disperse an entire assembly, or reason alone to escalate the Sheriff's Office's crowd management response phase (i.e., moving from stewardship to intervention or control).[25]

7.2 Require the gear and equipment used to be proportional to the disposition of the crowd—begin with the lowest response level and be prepared to adjust if conditions change. When asked, the Sheriff's Office made clear that the purpose of tactical gear utilized by the RDF is the protection of deputies. It is best practice to minimize a militarized appearance of a crowd management team and only use tactical gear and equipment in public view if there is an articulable reason.[26] Appearance of law enforcement in tactical gear increases tension between crowds and law enforcement and erodes public trust.[27] When responding to public assemblies and other large-scale events, the RDF's display of tactical gear and equipment should not be used to intimidate the crowd or interfere with individuals' ability to express their First Amendment rights. OLEO recommends adding language to the policy affirming that RDF members will initially appear in minimal gear and utilize minimal equipment to underscore their intention not to use tactical gear in a manner solely to intimidate a crowd. Additional tactical gear and equipment should be staged out of the public view and only used when necessary.

RECOMMENDATION 8.

Restrict use of force in crowd management situations to reflect best practices and reduce the risk of harm to event participants and unintended targets.

Misuse of force during a crowd management situation can have grave consequences from infringing on constitutionally protected rights; to costly litigation against law enforcement and municipalities; to inflicting serious injury, disability, or even death.[28] Any use of force against a crowd escalates tensions between law enforcement and members of the crowd and runs counter to the goal to de-escalate a civil disturbance and restore public order.[29] By law, all use of force, whether against an individual or a crowd, must be necessary, reasonable, and proportional to the conduct justifying the force.[30] Further, as made clear by the Washington State Attorney General's *Use of Force in Crowd Management Incidents Best Practices* (AGO Best Practices), "Declaring a protest to be an unlawful assembly or a 'riot' does not affect the requirement that each use of physical force must be necessary and for a lawful purpose."[31]

The following recommendations address use of these weapons as well as use of force against individuals engaged in passive resistance.

The Sheriff's Office has authorized the following weapons for use by the RDF:

- less lethal impact munitions (40mm launchers which shoot sponge-nosed projectiles),
- chemical incapacitants (which includes CS gas also known as tear gas, OC spray also known as pepper spray, and pepper balls/pepper impact projectiles),
- batons, and
- distraction devices or flash bangs.

8.1 Prohibit the use of force against any person engaged in passive, nonviolent resistance other than physically moving the person when necessary for their safety or public safety. Currently, the RDF SOP's only prohibition on using force against passive resistors is that "members shall not use less lethal weapons on persons engaged only in passive resistance." The policy should include AGO Best Practices [32] requiring Sheriff's Office personnel to:

a. Attempt to communicate with individuals engaged in passive resistance to achieve a peaceful resolution.
b. Only physically move a person after efforts to gain voluntary compliance have been exhausted *and* only if moving them is necessary for that person's safety or public safety.
c. Never use tactics that are reasonably likely to cause pain on passively resistant individuals.

Additionally, OLEO recommends prohibiting the use of force or other dispersal tactics on individuals solely engaged in passive resistance who communicate that their noncompliance is undertaken with the intent to be arrested. [33] In these situations, the RDF should calmly take the individual into custody without any escalation or use of force.

8.2 Apply the same restrictions for use of tear gas to all chemical incapacitants used for crowd management and require additional safeguards to prevent widespread harm to event participants and unintended targets. Using chemical incapacitants, including tear gas and pepper balls, in highly populated or densely packed spaces, such as crowds, carries greater risks of impacting unintended targets. Tear gas and pepper spray "can cause significant injuries as well as permanent disabilities."[34]

In addition to the requirements already listed in the RDF SOP limiting the use of tear gas for crowd management, OLEO recommends adding the following conditions that must all be met before use, which would apply to both tear gas and chemical incapacitants:

a. An unlawful assembly has been declared,[35]
b. Avenues of escape/egress are available to the crowd and individuals are given an objectively reasonable amount of time to disperse,[36]
c. De-escalation techniques have been exhausted,[37]
d. There has been an objectively reasonable effort to identify and separate persons engaged in violent acts,[38]
e. All necessary steps have been taken to limit exposure to unintended targets by targeting deployment of chemical incapacitants or tear gas at those engaged in violent acts,[39]

f. Chemical incapacitants and tear gas are used only with the frequency, intensity, and manner that is proportional to the threat and objectively reasonable,[40] and
g. Personnel/deputies are equipped with protective gear.[41]

8.3 Restrict the use of batons for pushing individuals within a crowd prior to issuing an order to disperse or when individuals are unable to move. The following language from the AGO Best Practices should be added to the policy: [42]

a. Officers shall not use batons to push a crowd prior to dispersal orders being given, and a reasonable time allowed to comply with such orders. This provision does not apply to officers using a baton to overcome an imminent threat of assault from a specific person.
b. Officers attempting to move a crowd or individuals using a baton shall not push anyone who is clearly unable to move back for reasons outside of their control (e.g., crowd surge, physical disability, physical barriers, etc.).

8.4 Prohibit the use of distraction devices except as a last resort. Because distraction devices carry risks of serious physical and psychological injury to crowds, including for unintended targets, their use should be avoided unless a civil disturbance has been declared, dispersal orders have been issued, and all other alternatives have been exhausted.[43] Distraction devices, which cause loud sounds and bright flashes of lights, can pose particular hazards for people with epilepsy, autism, and sensory sensitivities.[44] Currently, the RDF SOP states that distraction devices may be deployed following an announcement that tear gas will be used on a crowd but offers no further guidance. The AGO Best Practice states that flash bang-type devices "shall not be used for crowd management purposes, except as a last resort."[45] If the Sheriff's Office uses a distraction device during an RDF operation, the justification for and impact of its use should be clearly documented in after-action reporting. OLEO expresses particular concern for use of tear gas and distraction devices simultaneously or in close time/physical proximity and recommends the Sheriff's Office clarify policy language to ensure each use of such tools are individually justified and necessary given specific crowd conditions.

RECOMMENDATION 9.

Impose additional restrictions on the use of less lethal impact munitions due to the risk of serious bodily harm to event participants and others.

OLEO has serious concerns regarding the use of less lethal impact munitions at public assemblies. Experts in the U.S. and internationally question whether less lethal impact munitions have any place in crowd management.[46] Many less lethal impact munitions cannot be accurately targeted at long distances, placing unintended targets in harm's way, and effectively rendering their use indiscriminate.[47] When used at close range, less lethal impact munitions carry a much greater risk of serious injury, disability, and death, in some cases mirroring the same level of risk of injury and death as the use of a lethal firearm.[48]

There is inconsistent language in the policy and RDF SOP regarding the standards justifying the use of less lethal impact munitions. The following recommendations aim to resolve the inconsistencies described below and reduce the risks of causing serious bodily harm:

9.1 Prohibit firing less lethal impact munitions on an individual person in a crowd unless that person is engaged in conduct posing an immediate threat of death or serious injury and can be accurately targeted without harm to unintended targets. Currently, the RDF SOP allows less lethal weapons, including impact munitions, to be used "on an individual person in a crowd if the person is engaged in conduct otherwise justifying the use of force under state law and Sheriff's Office policy." Further, the RDF SOP states only that deputies "shall *attempt* to minimize the incidental impact" on unintended targets. In a separate section of the policy manual (GOM 6.03.000 Less Lethal Weapons), the standard for using impact munitions is when individuals pose an "immediate threat of bodily harm" to themselves, deputies, or others.[49] Clarification and consistent language on these standards in all policy sections will support public understanding and consistent application of the policy.

Less lethal weapons have the potential to inflict severe injury, disability, and death, including to unintended targets,[50] particularly given the concerns around the accuracy of targeting less lethal impact munitions.[51] Therefore, OLEO recommends that the standard for firing at an individual in a crowd match the standard for deadly force, meaning less lethal impact munitions should only be used on an individual in a crowd (where potential for harm to unintended targets is significantly higher) when the target is engaged in conduct posing an immediate threat of death or serious injury. Further, the policy should explicitly require less-lethal operators to take steps to minimize harm to unintended targets.[52] Consistent with AGO Best Practices, the policy should require deputies to consider "the feasibility of using other force techniques" before firing an impact projectile weapon at an individual within a crowd.[53]

9.2 Prohibit the deployment of less lethal impact munitions indiscriminately into a group or crowd of people. Deploying less lethal impact munitions into a group can result in serious or fatal injury for unintended targets and escalate the situation.[54] It is established best practice that impact projectiles should not be fired indiscriminately into a crowd.[55] Currently, the RDF SOP states that less lethal force options, including impact munitions, shall not be used "indiscriminately, unless otherwise permitted by law or policy." GOM 6.03.065(9) states that "less lethal impact munitions will not be deployed for large fights, public disturbance, or riots, unless they are being deployed as part of a demonstration management team with supervisor approval."[56] This language does not articulate specific conditions for acceptable indiscriminate deployment of less lethal impact munitions into a group or crowd, also referred to in the RDF SOP as use of less lethal impact munitions for crowd management purposes. OLEO recommends expressly prohibiting the deployment of these munitions for crowd management. Any exceptions permitting the use of less lethal munitions for crowd management should be detailed within the policy language.

9.3 Align the additional targeting restrictions on using less lethal impact munitions for crowd management with the existing Less Lethal Weapons policy. Deployment of less lethal weapons at an overly close distance is more likely to result in fatal injury.[57] The current Less Lethal Weapons policy (GOM 6.03.065(6)(b)) prohibits firing a less lethal impact munition from a distance closer than the manufacturer's specifications unless deadly force is justified, but GOM 11.10.000 and RDF SOP do not restate this restriction. For clarity, the crowd management policy should restate that restriction and identify the minimum

distance from an intended target recommended by the manufacturer for deployment of less lethal impact.

GOM 6.03.065 also states that less lethal impact munitions should not be used to intentionally target "the head, neck, chest, or groin," unless deadly force is authorized[58]—but the RDF SOP only mentions not targeting "the head of a person." The Sheriff's Office should expand the prohibitions on targeting these vulnerable areas in GOM 11.10.000 to align with the other less lethal policy sections, as targeting these areas increases the risk of fatal or disabling injury.[59]

RECOMMENDATION 10.

Specify what conditions necessitate crowd dispersal and how announcements of law enforcement action to disperse a crowd shall be made to minimize deputy discretion and promote public safety.

Crowd dispersal should be a last resort and should only occur when a civil disturbance cannot be contained with alternative de-escalation tactics. Historically, law enforcement agencies have improperly issued dispersal orders against crowds that are peacefully demonstrating, which can escalate tension and result in violence and infringement of constitutional rights. [60] Developing specific and strict circumstances under which a dispersal warning can be issued ensures that people are able to fully express their First Amendment rights safely while ensuring law enforcement has clear avenues to restore public safety when necessary.[61] The current RDF SOP offers incomplete procedures regarding crowd dispersal orders and tactics. OLEO recommends adding the following items to policy to align with best practices and strengthen decision making in high-stress situations.

10.1 State the specific conditions that necessitate crowd dispersal. Specifying narrow conditions under which Sheriff's Office personnel can issue orders to disperse ensures consistent and transparent standards for crowd dispersals. The current RDF SOP states that an Incident Commander may order the crowd to disperse "when three or more persons are unlawfully assembled." OLEO recommends adopting standards similar to the D.C. Metropolitan Police Department's policy (effective January 2025) that crowd dispersal orders are not issued unless an event is classified as a civil disturbance ***and*** a significant number/percentage of the assembly are engaging or are about to engage in unlawful disorderly conduct, or relevant executive with authority has declared a public safety emergency not based solely on the occurrence of the assembly.[62] This alternative language more clearly and narrowly defines the situations where a crowd dispersal is necessary.

10.2 Document justification for issuing a dispersal order and communicate the justification to the public. OLEO recommends that Sheriff's Office personnel communicate to the crowd why they are being ordered to disperse at the time of delivering the order, document the justification, and publish the reason a dispersal order was issued at an event as soon as feasible after de-mobilization, and upon request from any individual.[63]

10.3 Instruct deputies to continue efforts to obtain voluntary compliance during crowd management or dispersal tactics and require tactics to be suspended when a crowd

appears to comply. Although crowd behavior may require an escalation in response tactics used by Sheriff's Office personnel—from crowd stewardship to crowd intervention to crowd control—as soon as the crowd appears to be complying with direction from the Sheriff's Office, response tactics should be lessened to ensure all tactics in use are directly proportional to the current conditions of the event. Sufficient opportunity to comply with an order to disperse should be tailored to the members of the crowd. For example, participants may have disabilities (visible or invisible) which require additional time to comply and accessible options and routes. Further, OLEO recommends that when issuing an order to disperse, dispersal tactics shall be suspended or lessened as the crowd complies or attempts to comply with the order.

10.4 Add specifications regarding crowd dispersal warnings and clarify the related responsibilities of the Incident Commander. Dispersal orders must be clear and actionable to ensure community members have the opportunity to comply safely. Providing explicit guidelines regarding dispersal orders increases members' ability to perform under stressful conditions. OLEO recommends that policy require:

a. Issuance of at least three dispersal warnings. This aligns with GOM 5.03.035 Mass Arrest Situations which requires that "at least three warnings should be given" prior to taking action to disperse the crowd. The current RDF SOP requires that "when feasible, members shall issue a minimum of two warnings," before taking action to disperse a crowd.
b. Five-minute warning intervals. The policy should align with GOM 5.03.035 requiring that "warnings should be given at 5-minute intervals" before taking action to disperse a crowd.
c. Accessibility be taken into consideration, including accessibility of warnings prior to uses of force and dispersal orders as well as accessibility of dispersal routes and sufficient opportunity to comply given that some members of the crowd may need more time to disperse safely. The Incident Commander should consider language, translation, use of interpreters, and ability for the crowd to hear and understand commands.
d. Specific language for crowd dispersal orders. Include the following crowd dispersal warning script in GOM 11.10.000 and update the script included in GOM 5.03.035 as adapted from Sheriff's Office policy and peer jurisdiction language:[64]

   "I am **[Rank and Name]** from the King County Sheriff's Office. This gathering has been declared to be an unlawful assembly because **[state specific reason]**. All those assembled at **[state the specific location]** are commanded to immediately disperse.

   RCW 9A.84.020 of Washington State Law requires you leave the area of an unlawful assembly when ordered to do so by a peace officer. If you remain in the area, you will be in violation of the law. **[Include special instructions for members of the media].**[c]

[c] The specification for media language was adapted from peer jurisdictions' policies on media procedures during crowd dispersals; see endnote 64.

If you fail to disperse, you may be arrested or subject to other police action. Other police actions may include but are not limited to the use of chemical irritants, impact rounds, and physical contact **[if true]**. These police tools are intended to be non-lethal but could lead to significant risk of injury.

The following routes of dispersal are available **[describe routes].** You have **[insert amount of time,** e.g., 15 minutes**]** to disperse.[d] It is now **[insert time]** and you must leave the area by **[specific time]**."

e. Recorded dispersal warnings. In accordance with the IACP model policy, OLEO recommends that, "Where possible, the warnings should be audio or video recorded and the time and the names of the issuing officers recorded in the Incident Commander's event log. The warning should be recorded from a location near the amplified audio device, and when feasible, from a location near protestors at the furthest distance from the device."[65]

f. Direction from the Incident Commander that:
   i. there is an avenue of escape sufficient to allow dispersal,
   ii. there are sufficient deputies in place to support or direct crowd movement,
   iii. all potentially necessary responders and personnel are on hand to carry out operations and planned tactics, and
   iv. there are two or more deputies at the rear of the crowd to verify the order to disperse is audible.[66]

RECOMMENDATION 11.

Require that mass arrests be used only as a last resort.

Law enforcement have used mass arrests to detain demonstrators during major protests across decades and jurisdictions.[67] In many cases, arrestees are placed in overcrowded, unsanitary conditions without food, water, or sanitary facilities,[68] violating their civil rights and leading to costly lawsuits.[69]

While the Sheriff's Office recently revised its Mass Arrest Situations policy (GOM 5.03.000), OLEO recommends that additional language be added throughout policy to emphasize the potential risks of mass arrests as a tactic and ensure they are only undertaken when necessary.

11.1 Add language that mass arrests should only be employed when all alternate tactics and strategies have been unsuccessful in addressing widespread civil disturbance. Without individualized probable cause for every single arrestee, mass arrests raise constitutional concerns.[70] The Sheriff's Office has a policy dedicated to mass arrest situations, GOM 5.03.000. The existing policy requires that mass arrests are handled methodically and properly, requiring probable cause for each individual arrest. However, OLEO recommends that the policy is updated to acknowledge that all alternative tactics should be exhausted before mass arrests are undertaken. Such alternative tactics include but are not limited to communication with dialogue deputies, de-escalation techniques,

[d] The time allotment for dispersal should be reasonable and reflective of present circumstances (crowd size, demonstration location, number of routes of egress, etc.).

clear commands to disperse, and sufficient opportunities to comply. The IACP model policy[71] and other jurisdictions' department policies[72] agree that mass arrests should be avoided and used only as a last resort.

11.2 Require the Incident Commander to consider additional factors before authorizing mass detentions or mass arrest to determine whether mass arrests are necessary and operationally possible. As the Sheriff's Office acknowledges, mass arrests are logistically complex and should only be undertaken when personnel are equipped to execute the arrests safely and in an orderly fashion, with established probable cause for each arrestee. Leadership's consideration of these factors (which are additions to the Incident Commander responsibilities already outlined in GOM 5.03.000 Mass Arrest and GOM 11.10.000) will aid in balancing the interests involved to determine if mass arrests should be authorized:

a. The number of people assembled and the safety of deputies,
b. The severity of the alleged violations as arrests may escalate or aggravate the crowd situation,
c. The effect mass arrests will have on operations,
d. If it is possible to safely isolate a small group of violent protesters to avoid mass arrest or detention,
e. Whether adequate transportation is available for arrestees, and
f. Whether adequate mass arrest or booking facilities are available.[e]

11.3 Require that all arrestees be photographed with the arresting deputy to assist in proper identification and documentation of the arrest. Additional photographs at the time of arrest should include the arrestee's property and any clear documentation of any injuries if applicable.[73]

RECOMMENDATION 12.

Require that Sheriff's Office personnel allow all injured persons access to medical aid, regardless of how the injury was sustained, and follow the post-force medical aid policy.

Existing policy requires that deputies will attempt to provide aid to any person exposed to chemical incapacitants, less lethal weapons, or other uses of force as soon as practicable. OLEO recommends expanding this requirement, in alignment with RCW 36.28A.445,[74] to all injured people regardless of how the injury was sustained.[75] Consistent with Law Enforcement Training and Community Safety Act standards, deputies should render aid, when safe to do so, until relieved by medics.[76] Instances where aid was offered and declined or not provided should be recorded in the event's After-Action report.[77]

Additionally, the policy should make clear that emergency medical services and community medics, should they be present, are allowed access to injured persons to render aid. For planned events, the Sheriff's Office should coordinate with local emergency services to establish emergency medical services staging areas.[78] Therefore, OLEO recommends that when safe and

[e] The Sheriff's Office Mass Arrest Situations policy contains language requiring the Incident Commander to ensure transportation and processing needs are available for arrests (GOM 5.03.025 (4)(e)), but GOM 11.10.000 and the RDF SOP do not have similar language, despite also addressing mass arrests.

practicable, RDF squads assist medics with accessing injured persons whether located in a crowd or behind law enforcement lines.

RECOMMENDATION 13.

Prohibit "kettling" and other restrictive containment tactics except when the Incident Commander has authorized mass arrests, issued clear warnings communicating intent to contain, and provided sufficient opportunity to comply. Kettling should only be used against those for whom there is individualized probable cause to effectuate arrests.

Kettling is a crowd control tactic where law enforcement officers surround or confine a group of individuals while limiting access in and out of a small area. Kettling is a controversial tactic that has been used nationwide, facing lawsuits and criticism.[79] Currently, GOM 11.10.000 and the RDF SOP make no mention of such containment tactics. This manner of crowd containment is problematic because it prevents members of a crowd from voluntarily complying with an order to disperse, can inappropriately involve unintended targets in an enforcement action, and can escalate tension in a crowd and lead to violence.[80] It is best practice that law enforcement agencies avoid kettling and other restrictive containment tactics unless absolutely necessary, such as when the RDF is conducting a mass arrest and there is probable cause and intent to arrest all individuals being kettled.[81] To avoid involvement of unintended targets, it is important to announce the intent to "kettle" or contain prior to initiating the action. For example: "Within X minutes if you do not disperse, we will restrict access to leave this area and will begin arresting all those who remain."

RECOMMENDATION 14.

Prohibit Sheriff's Office personnel from collaborating with vigilantes, armed groups, or other non-law enforcement groups for crowd management purposes (e.g., crowd management tactics, uses of force, arrests).

Throughout the rise of Black Lives Matters protests in 2020, there was also a rise of armed groups patrolling demonstrations.[82] While most law enforcement agencies do not promote or sanction the use of armed civilians for crowd management, some officers have encouraged armed counterdemonstrators or non-law enforcement groups to protect property or engage demonstrators at protests, delegating de-escalation to these non-law enforcement actors.[83] Entrusting de-escalation or any crowd management behaviors to non-law enforcement groups, particularly when armed, does not prove effective and has resulted in the loss of life.[84]

While OLEO has no knowledge of the Sheriff's Office coordinating with non-law enforcement groups for crowd management purposes, OLEO recommends the Sheriff's Office adopt a prohibition on working with vigilantes, armed groups, and other non-law enforcement groups during crowd management.[85] The use of untrained or armed civilians heightens the risk of conflict and violence.[86] All civilians present at an assembly should be treated equally, unless their individual behavior warrants differential treatment. While communication with demonstration leaders, counterdemonstrators, or organizers is an important part of crowd management, the Sheriff's Office should communicate to the public that they will never enlist or authorize any non-law enforcement groups to take enforcement actions against other members of the crowd. No part of the policy developed by the Sheriff's Office should impact RDF members' ability to communicate with assembly organizers, delegate the de-escalation of event participants to

demonstrator organizations, and communicate with the public during crowd management situations.

Section 3: Ensuring transparency and accountability throughout the Sheriff's Office response to crowd situations

RECOMMENDATION 15.

Require that Sheriff's Office personnel participating in all levels of crowd management wear and utilize body-worn cameras to promote transparency and accountability.

Body-worn cameras can be a helpful tool to document events, improve transparency, and aid accountability efforts.[87] Nationally, jurisdictions require the use of body-worn cameras at demonstrations and large-scale events.[88] While GOM 14.01.000 Body-Worn Cameras/In-Car Video would generally require body-worn camera use for RDF members, OLEO recommends that GOM 11.10.000 or 14.01.000 include the following crowd management specific language on body-worn camera (or BWC used below) use adapted from the D.C. Metropolitan Police Department policy (effective January 2025):

> "Members shall activate their BWC when responding to demonstrations. Every member shall be outfitted with a body-worn camera, regardless of rank. Members **shall not** record First Amendment demonstrations for the sole purpose of identifying and recording the presence of individual participants who are not engaged in unlawful conduct. **Furthermore, BWCs shall not be used for systemic, indiscriminate tracking of individuals, wide-scale monitoring, or unauthorized surveillance**.[89] It is permissible for members to record the presence of individual participants not engaged in unlawful conduct while performing other police functions (e.g., maintaining the peace)."[90]

To facilitate proper body-worn camera use at large-scale events and potentially long-term deployments, the Sheriff's Office should create guidelines and procedures to ensure adequate access to cameras, backup batteries, and uploading and charging equipment for the duration of any deputy presence at a large-scale event.

The Sheriff's Office should also develop guidelines regarding the release of footage captured at large-scale events. While there is widespread public support of body-worn camera usage,[91] failing to release footage recorded at events undermines the principles of transparency and accountability.[92] OLEO recommends that all footage captured at large-scale events be made available upon request. In publicly accessible videos from assemblies, individuals' identifiable information and features should be blurred from view.

RECOMMENDATION 16.

Notify OLEO of Rapid Deployment Force staging and deployment to support mutual goals of transparency and building community trust.

Collaboration and information sharing between the Sheriff's Office and OLEO is mutually beneficial and ensures King County residents receive the best public safety services possible. The Sheriff's Office has existing practices to share sensitive information with OLEO, including policy updates and critical incident notifications, to facilitate OLEO's oversight mandate.

Historically, when there are demonstrations across King County, OLEO has received an influx of misconduct complaints requiring additional staffing to conduct intake and review the higher-than-normal volume of cases. In 2020, OLEO received a significant number of complaints related to various demonstrations. Advance notification of RDF deployment, mass arrest, or uses of force in crowd management situations would expedite OLEO's ability to distinguish complaints involving Sheriff's Office personnel or officers working for different law enforcement agencies, allow for community engagement before and after an event, and coordinate staffing and resourcing for possible critical incidents.

Notification to OLEO should include:

- The anticipated date(s) of events if known,
- The reason for RDF staging and deployment,
- Event location, size, and current and expected crowd demeanor,
- A list of other responding agencies if applicable,
- A deployment-specific roster of RDF ID numbers, including associated deputy information,
- A list of RDF squad supervisors,
- A list of less-lethal operators,
- A list of deployed equipment, and
- A copy of the Incident Action Plan once finalized.

Notification should occur as soon as practicable for planned events, and as soon as practicable for unplanned events but at least within 24-hours of demobilization.

RECOMMENDATION 17.

Require the Incident Commander to complete a thorough After-Action report and share it with OLEO to improve communication and transparency.

17.1 After the event, require the Incident Commander to write a report on decision making, complete an After-Action report with additional elements, and review approved After-Action reports from Squad Supervisors. While GOM 11.10.155 contains language stating that "After an event, the Incident Commander will complete an After-Action report," the RDF SOP creates some confusion by only requiring an After-Action report "for non extended events," and requiring an overall report "when applicable." This conflicting language in the RDF SOP should be removed to align with the policy on After-Action Reporting (GOM 11.10.155). The RDF SOP also requires the lead supervisor of each squad to write an After-Action report for any force used by the squad. The Incident Commander should incorporate key takeaways in squad supervisor reports in their own After-Action report. In addition to explanations of all incidents of force, the After-Action report should include:

a. The justification for deploying the equipment used,
b. Information on warnings and announcements issued during the event,
c. The justification for the amount of time a crowd is given to disperse, and
d. The justification for escalating the level of crowd management from stewardship to a higher level (crowd intervention and crowd control), if there was an escalation.

17.2 Require the After-Action report to be shared with OLEO within 72 hours of the RDF being demobilized.

RECOMMENDATION 18.

Include community stakeholders in the post-event review process to improve public relationships and promote transparency.

The Police Executive Research Forum recommends that community representatives be invited to debrief alongside law enforcement in order to promote trust and encourage feedback around the actions taken by the Sheriff's Office during the event.[93] Processes for community debrief and post-event review should be established in policy.

OLEO recommends that community participation:

- Must be meaningfully solicited, through community forums, surveys, or other engagement efforts, following any large-scale event where an order to disperse was issued or where force was used,
- May be solicited for all other events where the Sheriff's Office believes it would benefit from community input, and that
- The Sheriff's Office should respond to and incorporate community feedback in public order tactics and practices whenever feasible.

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