

A CONFLICT OF RIGHTS

Executive Summary and Policy Recommendations

A CONFLICT OF RIGHTS: Public Safety and Abortion Clinic Conflict and Violence

Executive Summary and Policy Recommendations

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A CONFLICT OF RIGHTS

SINCE THE U.S. SUPREME COURT'S LANDMARK DECISION in *Roe v. Wade* (1973), conflict between abortion supporters and foes has grown. In fact, according to the Bureau of Alcohol, Tobacco, and Firearms (1998), between 1982 and 1998, abortion-related conflicts resulted in at least 149 arsons and 47 bombings. In addition, the National Abortion Federation (1998) reports that six murders, 15 attempted murders and countless episodes of burglaries, kidnappings, invasions of clinics and stalkings have resulted from the abortion controversy. The Life Research Institute adds that Pro-Life protesters are victims of numerous incidents of violence as well, although they have not systematized their efforts to document these incidents.

While abortion conflict and violence reached a climax during the late 1970s and the 1980s, it continues to affect numerous stakeholders, including health care providers, patients, protesters, law enforcement officials, members of the media and representatives of the criminal justice system. Because of the potential severity of the conflict, the threat to public safety and the variety of stakeholders affected by this issue, the Police Executive Research Forum (PERF) was supported by a grant from the Henry J. Kaiser Family Foundation to examine the actual nature and scope of the problem. In doing so, this project has focused on the sources and consequences of abortion- and clinic-related conflict and violence,¹ with a goal of developing police strategies to ensure the safety of all stakeholders. The national policy recommendations that follow are the result of the research.

RESEARCH SUMMARY

The study took an impartial approach, balancing input from individuals on all sides of the abortion issue to develop policy-relevant guidelines for police agencies that respond to abortion-related conflicts. The research consisted of three phases: a national survey of police agencies, case studies of sites with experience in dealing with this conflict, and a series of focus groups bringing to the debate a cross section of stakeholders from around the country. In all, the research produced a variety of qualitative and quantitative data.

Phase One: The National Survey

The research began with exploratory, open-ended telephone interviews with representatives of national advocacy groups. Organization representatives interviewed ranged from the Bureau of Alcohol, Tobacco and Firearms (ATF) and the U.S. Marshal's Office, to Operation Rescue, the National Right to Life Committee, the Planned Parenthood Federation of America, the National Abortion and Reproductive Rights Action League (NARAL) and the National Abortion Federation (NAF). With the results from these interviews, PERF staff designed and conducted a national survey of 512 major city police chiefs from communities serving populations greater than 50,000.

Administered during the summer of 1996, the national survey sought to determine the nature, scope and frequency of abortion-related conflict; trends that exist in type and location of conflict and violence; activities that have the potential for conflict and violence; police responses to such conflict and other key issues. The national survey consisted of 28 questions designed to produce data concerning 286 usable variables. A total of 395 law enforcement agencies from 45 states responded to the survey—a 77 percent response rate.

Survey Results

Analysis reveals 70 percent of jurisdictions with more than 50,000 population have at least one known abortion provider—one-third of those have three or more—within their jurisdiction. Further,

- of those jurisdictions with known providers, two-thirds (67%) have experienced actual abortion-related incidents, ranging from protests and demonstrations to murder, during the past five years. Generally, larger jurisdictions have more providers that have experienced conflict;
- for agencies able to assess trends in the number and severity of incidents of conflict and violence, most reported both had become less frequent and less severe. Only nine jurisdictions reported increased incidents; seven noted incidents that were of worsening severity;
- those agencies reporting declining numbers of incidents attributed the change to a reduced number of protesters and changes in their tactics, a reduction in the number of pro-

viders and improved security for those that remain, and their own local enforcement efforts. The deterring impact of the Freedom of Access to Clinic Entrances (FACE) law and local judicial actions (restraining orders, lawsuits, and injunctions) often were mentioned as well;

- those reporting declining severity credited reduced or changed protester activity and, to a lesser extent, local enforcement efforts for the difference;
- slightly more than half the agencies that had experienced incidents of conflict and violence reported a single facility had attracted the greatest amount of conflict. This was especially so among smaller communities, although more than 40 percent of even the largest jurisdictions reported this specific targeting of clinics as well;
- to explain why a provider might be targeted for protests and conflict, the police noted the visibility of location, easy access from public sidewalks and proximity to a main thoroughfare as the primary explanations. The potential for media coverage, high number of abortions performed and availability of large religious populations nearby were selected explanations as well;
- as for the participants themselves, most agencies agreed locally based groups—with a mix of local and non-local residents—were responsible for initiating the abortion-related conflicts and violence in their communities; and
- finally, few agencies reported the use of federal legislation involving abortion conflicts, and most had little need for involvement from federal agencies in responding to the incidents that do occur. Further, few agencies offer training—either pre- or in-service—to guide their officers' decision making in response to abortion-related issues.

With the results of the survey in mind, nine police departments with experience in responding to abortion-related conflicts were selected for more detailed examination and discussions.

THE FIELD RESEARCH

Phases two and three involved more in-depth assessments of abortion-related conflict through field research at nine sites. This research included structured focus group sessions and case studies of police departments and localities that have experienced abortion conflict and violence.

Phase Two: Case Studies

From the survey results, project staff identified nine police departments with experience in managing and responding to different levels of abortion-related conflict and violence. On-site case studies were then completed in Portland, Oregon; Brookline, Massachusetts; Knoxville, Tennessee; Pensacola, Florida; Rochester, New York; Dallas, Texas; Wichita, Kansas; Cincinnati, Ohio; and Washington, D.C. At each site, staff interviewed police officials, clinic personnel, Pro-Choice and Pro-Life activists, journalists and criminal justice officials for their opinions and ideas.

Our on-site work found several of the departments have developed successful approaches to address abortion-related conflict and violence in their communities. Generally, we concluded the departments that established practices in the following areas were more successful in minimizing conflict situations:

- *Clear Goals and Priorities.* Departments with established goals and priorities that balance the rights of all stakeholders involved in the debate were consistently evaluated positively by the research participants.
- *Neutral Response Protocols.* Departments with established goals and priorities in place were more likely to develop and apply a neutral and consistent response protocol. PERF's policy recommendations include key components of the most effective response protocols observed on-site.
- *Enhanced Outreach and Communication.* Police agencies that actively network and communicate with stakeholders regarding department goals, priorities and law enforcement responses enhanced both cooperation and de-escalation of conflicts. To cultivate this communication, some departments designated an officer(s) to act as a liaison between the department, clinic and protesters. This liaison position was well accepted by stakeholders from both sides and appeared to result in better communication, better relations

and a reduction in conflicts. Additionally, some departments held pre-event planning meetings prior to large demonstrations and protests. During these meetings, participants from both sides were briefed about relevant laws, acceptable behavior and law enforcement expectations and responses. Research participants found these meetings helpful.

- *Collaboration with Criminal Justice Community.* Agencies that collaborate with local prosecutors, judges and other criminal justice personnel appear to apply more uniformed, system-wide responses. Such collaborations streamline the arrest procedure, build stronger cases resulting in successful prosecution and prevent important details from falling through the cracks (e.g., having adequate jail space during large-scale events).
- *Specialized Training.* Finally, specialized training that relates to the participants, conflicts and the police response appear to assist in department efforts.

Phase Three: Focus Groups

In addition to the case studies, a series of structured focus groups were held at five sites: Portland; Knoxville; Dallas; Cincinnati and Washington, DC. Staff selected sites based on the project's survey results, a desire for geographical representation and from awareness of prior conflicts and violence. Each focus group solicited participants' views about abortion-related conflict as it exists in their own community, as well as recommendations they felt appropriate for stakeholders on both sides of the issue. Participants (12 to 15 per group) were chosen for their ability to represent differing views and perspectives thoughtfully, with each group including representatives from clinics, activist and demonstrator groups (Pro-Life and Pro-Choice), religious communities, police, prosecutors and judges, and the local news media. Among the views expressed were the following:

- *Goals and Tactics of Stakeholders.* Consistently, Pro-Choice participants across all sites expressed the belief that the goal of Pro-Life activists is to harass and intimidate patients and clinic staff under the guise of expressing First Amendment rights. Pro-Life participants, meanwhile, expressed a belief that the Pro-Choice goal is to eliminate their First Amendment rights by over-exaggerating the extent of conflict and violence that occurs.

A CONFLICT OF RIGHTS

- *Factors Conducive to Violence.* Participants from both sides generally agreed with the police in their description of factors conducive to conflict and violence. These included the verbal exchanges and interactions that occur between protesters and staff, clinic location and availability, the size of demonstrations and the presence of counter-demonstrators. In addition, violence in other jurisdictions, media sensationalism, police bias and responses to incidents, and local politics were each cited as factors that spur additional activity.
- *Nature and Extent of Conflict.* Most participants across sites agreed that, overall, the number of violent incidents and demonstrations is declining due to the FACE legislation. However, many Pro-Life advocates warned that due to the FACE legislation, “legitimate protests” are no longer lawful and peaceful civil disobedience (e.g., blockades) is a federal offense. In their eyes, the “criminalization of Pro-Life activity” will result in an increase of violent incidents because the penalties for violent and nonviolent acts are comparable. As such, the disincentive for violence is removed. In addition, they point out that as more restrictions are placed on peaceful protests, the less likely moderate participants in the Pro-Life movement will be able to deter members of the fringe. Hence, they fear an additional wave of violence will soon emerge.
- *Assessment of the Police.* Across all sites, participants viewed the police as biased toward the opposition. They argued police responses, attitudes, language and behaviors are influenced by officers’ biases. All participants reported experiencing problems with patrol officers. Patrol responses were often inconsistent, over-aggressive (pain compliance), under-aggressive (allowing protesters to block clinics), slow, uninformed about relevant laws and injunctions, and insensitive to the needs and rights of either the clinics or the Pro-Life protesters. Additionally, the question of off-duty employment of police officers was identified as an important issue for consideration in each jurisdiction because of its potential role in undermining community confidence about police neutrality.

- *Conflict Reduction.* Participants from both sides expressed a belief that improved relationships with their local police can help reduce conflict and violence.

THE POLICY RECOMMENDATIONS

The primary goal of the project was to develop a set of practical policy recommendations to improve police responses to abortion-related conflict and violence. To accomplish that end, we initially established policy goals and general domains from the findings of phase one and two of the research. Specific recommendations within each domain were then developed. The fifth focus group, consisting of national and locally based representatives from law enforcement and the Pro-Life and Pro-Choice communities, was then held in Washington, D.C., to review PERF's proposals. While not all participants agreed with every recommendation, what follows is an overview of the results.

Policy Goals and Domains

Goals: In addressing abortion-related conflicts, police agencies should recognize the multiple goals they must balance. At times the following responsibilities may be in conflict with each other:

- Maintain order and protect clinics—they are legal businesses;
- Mediate conflicts between stakeholders;
- Safeguard the constitutional rights of demonstrators and other participants;
- Protect the rights of patients to enter clinics safely without intimidation or harassment (as defined by law); and
- Protect the rights of surrounding businesses, residents and passersby.

Expectations: Police departments should establish clear guidelines regarding their responses to both routine calls for service on abortion issues and at planned events such as demonstrations and protests. These guidelines should outline clearly acceptable behavior for participants and explain the police response in instances when violations occur.

ORGANIZATIONAL PREPAREDNESS

Departments should implement organizational changes to manage their responses to abortion-related conflicts and violence. These changes should include establishing a police liaison to work with the stakeholders in the abortion controversy and training officers and dispatchers on department procedures. By instituting these measures, police departments will help officers respond consistently and impartially to incidents as they occur.

Recommendation 1:

Establishing a Liaison Between Police and Stakeholders

Police departments should assign one or more officers to act as liaison between the police and stakeholders in the abortion issue. In appointing liaison officers, departments should designate personnel who understand the complexities of the issue, have respect for stakeholders' concerns, and can maintain neutrality during the assignment. Agencies should also choose officers who have been granted the authority to speak for the department. It is important for everyone involved to have confidence in the liaison officer's decisions. Hence, liaison officers must have the authority to support the statements they make to participants.

As part of their role, liaison officers should

- develop relationships with prominent Pro-Life and Pro-Choice activists, clinic staff, churches, area businesses and other groups that abortion-related activity might affect. To foster these relationships, liaison officers should maintain regular contact with individual participants to allow them to voice their concerns regarding police responses and practices. Although liaison officers may not need to accommodate each concern, they should fully understand the perspectives surrounding the abortion issue and the motivations of the activists. By establishing these relationships, participants will feel comfortable contacting the liaison officers with emerging issues.
- be notified when other officers in the department receive calls concerning an abortion-related event. Although it is not essential for liaison officers to respond to each call, it is necessary for them to be aware of and follow up on calls. This process allows liaison officers to monitor the patrol response and the complainant's satisfaction. It also strength-

ens the relationship between participants and police while enhancing intelligence gathering.

- ensure that in-service training is provided to patrol officers and special units responding to abortion-related conflicts. In these sessions, liaison officers should discuss Pro-Life and Pro-Choice beliefs and sensitize officers to the language surrounding the abortion issue. Liaison officers should also help their colleagues understand the motivations of Pro-Life and Pro-Choice activists, as well as participants' concerns regarding police responses to abortion-related conflicts. This understanding will help officers listen to participants and effectively respond to their concerns and calls for service.
- remain aware of arrest records and criminal histories of participants. Regular reviews of such information will assist in the identification of patterns of escalating conflict behaviors.

**Recommendation 2:
Communication of Police Policies**

In addition to the liaison officer's informal contacts with stakeholders, he or she should meet both formally and regularly with Pro-Life and Pro-Choice activists to inform them about department procedures, relevant laws and injunctions. During these meetings, officers should provide written guidelines to sidewalk counselors, escorts and other participants that outline appropriate and legal conduct during protests. These meetings will help activists exercise their rights safely within legal parameters and enhance communication between officers and participants.

Discussion

Those involved in the case studies and the October 24, 1997, policy recommendation meeting supported the proposal to establish liaison officers. Although participants expressed concerns that many police departments may not have sufficient resources to assign liaison officers, they nonetheless emphasized the liaisons' importance. In support of the recommendation, Pat Mahoney from the Christian Defense Coalition asserted it is "critical . . . to have a [police] representative who hears both Pro-Life and Pro-Choice people on this issue." Participants also emphasized that by listening to the parties and monitoring police

responses to abortion-related conflicts, liaison officers could help those involved feel safe. During PERF's site visits, participants in Dallas, Brookline, Portland and Rochester expressed beliefs that liaison officers in those cities had reduced abortion-related conflict and had increased the perception of police neutrality.

Recommendation 3: Training for Officers

Legal and Constitutional Issues: In addition to establishing a liaison officer, departments should provide training for officers on local and federal laws pertaining to demonstrations and protests, First Amendment rights and patients' reproductive rights. Participants in PERF's site visits and policy recommendation meeting claimed they often have encountered officers who were unaware of the details of the FACE law, injunctions, relevant court decisions and their departmental policies and procedures. This unfamiliarity with the law frustrates participants and creates the perception that the police are unprofessional. To address this perception and increase uniform training among officers, departments should use a legal expert to inform officers about pertinent legal authorities.

Understanding the Issues: Stakeholder Perceptions and Perspectives: Many participants believed officers should understand stakeholders' motivations, beliefs and fears. As noted in Recommendation 2, the liaison officer can play an important role in officer training and should educate other officers about stakeholders' perceptions and perspectives, the appropriate use of language and other relevant information about recurring abortion-related incidents. Recurring incidents are symptoms of underlying conflict and require a comprehensive response from the agency. The liaison officer should ensure other department personnel are trained in identifying such incidents and developing appropriate responses.

Support for this recommendation came from both sides of the abortion debate. For example, a clinic staff participant in one case study visit described a call for police service in which responding officers asked clinic employees to complete a complaint that required employees to record their home addresses. Fearing for their safety, the employees refused to release their home addresses because formal complaints are public information. They attempted to record the clinic's address for contact information instead. The officers reportedly perceived this refusal as non-compliance with police procedures and left without filing a report.

In other instances, police have misinterpreted the passive resistance of Pro-Life demonstrators as a challenge to their authority as well. The Pro-Life demonstrators, however, use this passivity as a means to “identify with the children.” Although this awareness should not affect an officer’s decisions to enforce the law, it should enhance the overall understanding of actions by the individuals involved. Consequently, this understanding may help officers respond to situations in a more appropriate manner.

Discussion

During the policy recommendation meeting, participants expressed varying views concerning this recommendation. Some participants claimed educating the officers about the abortion controversy was essential. They stipulated, however, that departments should invite leaders from Pro-Life and Pro-Choice groups to train officers about these perspectives. According to these participants, there is considerable misinformation on the issue and the presence of those involved in the abortion controversy would provide better information and understanding.

Police representatives at the meeting also supported the recommendation for improved training. Captain Doug Kowalski from the Dallas Police Department suggested many officers perceived clinics as “nuisance locations.” Some officers might even view demonstrators at these locations as “criminals.” Because of this, Captain Kowalski argued officers need training to help them realize the demonstrators “for the most part . . . are lawabiding citizens.” Police representatives, however, were concerned about using representatives from Pro-Life and Pro-Choice groups to train the police. In their training sessions, they explained, officers have found videos and in-service trainers such as a liaison officer are more effective than having civilians train the police.

Although law enforcement representatives and Pro-Life groups supported training, Pro-Choice participants declared departments should not make such training a priority. An officer, according to these participants, needs to determine whether individuals broke the law and “not why they broke it.” Attempting to make officers understand the various motivations of the demonstrators places an unnecessary burden on the police, they suggested. These participants primarily were concerned that police performed their job in a professional manner.

PERF's Response

To ensure a professional police response, PERF agrees training for officers is essential. Enforcing the law is but one aspect of the police duty; equally important are enhanced management of demonstrations and efforts to prevent the recurrence of violent conflict. Officers' assessments of activists' actions affect police responses—without an understanding of the community with whom they are interacting, officers' reactions to an abortion-related conflict could exacerbate tensions rather than mitigate them. Consequently, officers may unintentionally perpetuate the conflict rather than resolve it. As such, we recommend that departments develop appropriate training programs for supervisors and patrol officers on the relevant issues associated with abortion-related conflicts.

Recommendation 4: Training for Dispatchers

In addition to the training that patrol and tactical officers receive, departments also should provide training to dispatchers concerning deployment procedures, communications and appropriate language when handling calls for service in abortion-related conflicts. We learned, for example, of dispatchers who had declined to dispatch requests for service at clinics, asking officers simply to “drive by” to assess incidents or situations. The demonstrators and clinic staff placing these calls perceived this response as biased. In other instances, police have told clinic personnel they are the lowest priority call—a response that also creates the perception of bias. Since the dispatchers' methods for communicating calls for service to these conflicts affect police response, dispatchers should learn how to handle calls impartially without prescreening calls based on personal ideologies. Trainers should familiarize dispatchers with locations where abortion-related conflicts frequently occur. Besides clinics, these locations may include streets and intersections. With this training, dispatchers will help officers effectively respond to calls for service.

RESPONDING TO PLANNED OR LARGE EVENTS

To manage large or planned events, it is important that police departments establish guidelines and communicate these policies to stakeholders before an event. The department should also consider policies regarding appropriate personnel deployment to manage the event, arrest procedures for civil disobedience and policies for managing the media. In turn, these established procedures will help manage and reduce the potential for conflict and violence.

**Recommendation 5:
Establishing Event Guidelines**

Before a planned event, the liaison officer should meet with leaders from the Pro-Life and Pro-Choice movements to communicate established guidelines. Officers should outline acceptable behavior and discuss police procedures for violations of these guidelines. To help clarify event guidelines, officers should discuss and distribute written information concerning injunctions and relevant laws. During these meetings, officers also should gather information about the upcoming event, such as the participation of visiting activists. If participants can identify out-of-town groups, then the local participants can help police contact and educate them about acceptable behavior during the event. By establishing guidelines and disseminating this information to the participants, officers can reduce conflict.

Discussion

Although the focus group participants supported establishing and communicating clear guidelines, they were concerned about the ability of police to identify third parties, including unaffiliated individuals and out-of-town groups. In some instances, clinic personnel and Pro-Life demonstrators are unaware that out-of-town activists will be participating in the planned event. Without this information, police cannot contact these parties to inform them about established guidelines for the event. Aside from these groups, police also cannot predict the behavior of clinic patients or those who accompany them. Participants in PERF's policy recommendation meeting asserted the police need to be cognizant of this uneducated third party. This factor may pose some difficulty for police to prepare for and manage planned events.

**Recommendation 6:
Enforcing the Rules**

After establishing guidelines and explaining them to participants, the police should take consistent and assertive action in response to violations. Officers responding to an abortion-related conflict should not decide which laws they will enforce or attempt to obtain participants' compliance to one rule by "bending" another. This type of flexibility negatively impacts participants' perceptions of police neutrality, while altering the relationship between stakeholders and the police. Furthermore, in instances in which the number of civilly disobedient activists overwhelms the police, officers should maintain their efforts at enforcement. Although tactical officers may need to modify their arrest procedures and make decisions concern-

ing the order of arrests, officers should uniformly enforce the law and arrest each participant who violates the law or police guidelines. This consistent enforcement of the rules will help officers effectively manage large and small planned events.

Discussion

Several participants in the policy recommendation meeting in Washington, D.C., stressed it was essential for officers to continue efforts to enforce relevant laws even when organized efforts overwhelm the police. Dena Vogler, from Women's Healthcare Services, emphasized this point, adding that negotiation strategies are a "prosecutorial issue, not a law enforcement issue. Law enforcement needs to enforce the laws consistently." Without this enforcement, participants have a "license to break the law." Some participants also expressed concern about the manner in which police make arrests. During large demonstrations, some agencies have made a tactical decision to arrest only leaders of the protest. This decision, according to Pro-Life focus group and several case study site participants, can result in chaos as new individuals emerge to continue leading activists in civil disobedience.

PERF's Response

A central component of PERF's recommendations maintains that the police should consistently arrest violators of the law. However, if agencies are restricted from focusing their enforcement efforts primarily on event leaders, we believe their impact may be unnecessarily limited. Police departments in Brookline and Wichita each reported their experience favors an approach that focuses on establishing and enforcing leaders' responsibility at events.

Recommendation 7: Establishing Physical Boundaries

When possible, officers should clearly mark junction and police zones (with paint, police tape, signs, etc.) to prevent possible disputes over legally protected territory. The police also should designate areas or establish barriers if counter-demonstrators are present. For example, the Brookline Police Department uses barricades to separate and confine opposing groups in safe areas. These physical barriers help minimize conflict and violence among the demonstrators. One factor in the establishment of such physical barriers should be the clinic's ability to maintain its business.

Recommendation 8:

Determining Appropriate Personnel Deployment

To enforce physical boundaries and event guidelines, agencies must carefully assess the numbers of on-scene officers necessary to manage each event. In making this decision, the police should neither under- nor over-deploy personnel since both send a message of bias. For example, at sites we visited, we learned of SWAT teams that were dispatched to stand by at small prayer vigils and of single officers sent to manage reported bomb threats at clinics. When in doubt, agencies should position additional personnel at a nearby location until officers can determine the nature and scope of the event. At large events, in addition to tactical assignments, we also suggest that two or more officers be assigned as primary contacts to participants; one each for the clinic and demonstrators, both Pro-Life and Pro-Choice. This strategy has a number of advantages; among them it

- ensures participant issues and needs are addressed and communicated;
- allows for police needs to be communicated to participants; and
- assists with on-scene intelligence gathering.

Recommendation 9:

Arrest Procedures

Before responding to an event, police agencies should establish procedures for arresting individuals who violate the law. After establishing guidelines for demonstrations, agencies should clarify what constitutes a violation and establish detainment procedures for these offenders. In Dallas, officers monitor the activities of the demonstrators and issue an initial warning to individuals who fail to comply with the law. After this warning, officers issue citations and inform the individuals that additional disobedience will result in arrests. If individuals with citations fail to comply, officers arrest them. To prevent demonstrators from becoming reinvolved in the event after an arrest, the Cincinnati Police Department has established a procedure of detaining arrestees until the conclusion of the ongoing event (Lord 1994).

When developing arrest procedures, the protocol should include guidelines for arresting individuals who “peacefully” resist arrest and refuse to walk to police vehicles. Rather than using pain compliance²

for these passive individuals, PERF recommends that officers use lift-and-carry teams. In each instance, police should use only the level of force necessary to effect the arrest.

Departments, including Dallas and Cincinnati, have found lift-and-carry teams provide an effective means of transporting peaceful violators. Unlike many agencies, Dallas has chosen not to employ stretchers for removing arrested demonstrators because officers have found many arrestees roll off these stretchers and injure themselves. Cincinnati, however, employs a modified canvas stretcher that allows officers to carry individuals without the danger of injury from falling. Both departments stress the use of the minimum amount of force necessary to overcome resistance. These arrest procedures help officers manage events and ensure the safety of both officers and participants.

Discussion

The Pro-Life and law enforcement representatives at PERF's policy recommendation meeting supported a recommendation against pain compliance. Pat Mahoney, for example, asserted, "The use of pain compliance for any political demonstrators is unacceptable." Dallas Police Captain Kowalski supported this statement and claimed the department does not use pain compliance for passive individuals because it does not want to "injure people who are not actively resisting an arrest."

Although many participants agreed with this recommendation, others expressed concern about it. Susan Hill from Women's Health Organization argued the PERF recommendation was "limiting the techniques" police had available to manage conflict situations. Since some departments may not have the resources to create lift-and-carry teams, they may need to resort to pain compliance to remove arrestees. Because of these factors, some meeting participants claimed the discretion to use pain compliance should remain an individual agency option.

PERF's Response

The necessity of removing passive offenders does not justify pain compliance, as defined for this report, even when the department lacks adequate personnel to establish lift-and-carry teams. When responding to abortion-related conflicts, officers have an obligation to protect the safety of individuals and should only compromise that safety when individuals pose an immediate danger to the officer or another citizen.

Passive offenders do not exceed this threshold. Thus, the use of disproportionate force against these violators is an inappropriate means to achieve the desired outcome and compromises the rights of the offenders. Other agencies, including Brookline, Dallas and Cincinnati, have demonstrated that with adequate planning, acceptable alternatives to the use of force are available.

- *Establish Arrest Teams.* As a tactical decision, departments also may choose to establish designated arrest teams. Cincinnati, for example, assigns SWAT personnel to these arrest teams because of these officers' higher level of fitness and training (Lord 1994), while in Rochester, officers detailed to the incident compose the arrest teams. Regardless of their composition, however, arrest teams should consist of two or more officers who have the responsibility of making the majority of all arrests. The use of these teams will minimize the number of officers who must appear in court and decrease the department's overtime expenses.
- *Establish Booking/Processing Teams.* Agencies should establish booking/processing teams for large-scale events. The processing teams should document all relevant information during the arrest procedure. An arrest log should be maintained containing information about the arrestee, the charge, the arrest team, the time of the arrest and the defendant's identification number. The processing team should always assign an identification number to each arrestee, as many individuals refuse to provide their names. In the event that flexicuffs are used, the processing team should record the identification number on the cuffs. In addition, the processing team is responsible for photographing the arrest team with the defendant. If necessary, the processing team should also videotape the event. Establishing a clear record of all event occurrences will help facilitate later criminal justice system processing.
- *Establish Transport Teams.* Once the processing team records all relevant information, transport officers are responsible for moving the arrestee to the detention facility. It is also their responsibility to ensure adequate vehicles and space in detention facilities are available.

A CONFLICT OF RIGHTS

- *Create an Event Response Kit.* Agencies should establish an event “response kit” that contains relevant documents and supplies for officers responding to events. This kit should include camera equipment along with copies of injunctions and guidelines pertaining to the event. It is important that a visual record be made of officers’ actions and instructions given to participants during an event. These videotapes and photographs, combined with the officers’ written documentation of the event, will help demonstrate participants’ violations, which will, in turn, assist prosecutors in court. In addition to these items, agencies also may want to include pre-printed arrest cards in the response kit. Arresting officers can read these cards to the arrestees to convey consistent and unbiased instructions. With these tools, departments can create a uniform response to planned demonstrations.

The Rochester Police Department uses arrest procedures similar to those outlined above. To expedite event responses, they have prepared a mass arrest kit that contains such items as preprinted arrest cards and forms, cameras, film, flexicuffs and photocopies of relevant laws. Officers detailed to the event are divided into task-oriented teams consisting of arrest, processing and transport. The arrest team usually consists of two officers who make all the arrests. While making an arrest, the team reads a preprinted statement from an arrest card, filling in the appropriate charge. During the arrest, the processing team takes a photograph of the arrest team with the arrestee holding his or her arrest card. The processing team also records all arrest information into a booking log. This log includes arrestee information, the specific charge and the date and time of the arrest. The processing teams then assign the arrestee an identification number that is entered into the log. After the processing team has completed its procedures, the arrestee is turned over to a transport team that assumes responsibility for the arrestee’s detention. These procedures and division of labor allow the detail commander and supervisors at the event to focus on their primary duties and to ensure the safety of the participants. In addition, this task-oriented strategy was implemented in Rochester to ensure arrest accountability, prosecution success and to reduce personnel and overtime costs associated with court appearances. Similar approaches have also been implemented in Cincinnati, Brookline and San Francisco.

**Recommendation 10:
Managing the Media On-Scene**

In addition to these procedures, police departments should develop guidelines for managing the media on-scene. While the media have multiple roles to play at demonstrations and protests, their goal of finding and displaying the most dramatic images make them a unique stakeholder. As such, the police should view the media as event participants with legitimate rights to information access—including regular educational briefings, post-event reviews and on-scene access to other participants. Their access to demonstrators, patients and clinic workers is not unlimited, however. When appropriate, the police should establish designated areas for media where demonstrators and others can go for interviews. Access to clinic personnel and patients is limited by their rights to privacy on private property.

Discussion

Overall, participants in the policy recommendation meeting in Washington, D.C., were opposed to this recommendation. Jim Risen, a *Los Angeles Times* reporter, asserted the police would “insult the press” if they treated reporters as stakeholders by designating an area for them. This limitation would deny reporters open access to the story and, he believes, heighten reporters’ efforts to cross police lines and enter barricaded areas.

Pro-Choice and Pro-Life participants agreed with these concerns, adding they often need the press to explain their message. Noting they have a “love-hate” relationship with the media, advocates from both sides were opposed to anything that would limit their access to reporters. Furthermore, they suggested the recommendation would not prevent the press from becoming participants in the event and exacerbating the conflict since the “media is a part of every story.”

**Recommendation 11:
Department Post-Event Briefing**

After an event, the involved police agency should hold internal, post-event briefings to evaluate its responses and ability to manage the incident. During these meetings, the liaison officer, tactical planners and others involved in the event should review department policies and procedures, analyze the effectiveness of liaison officers and consider the effectiveness of training for department personnel. The agency can use this information to modify and improve its policies for police responses to future planned events. Separate post-event briefings involving the liaison officer and stakeholder groups involved should follow the department’s internal review.

RESPONDING TO CALLS FOR SERVICE

Officers should develop relationships with clinic staff and regular demonstrators to prepare their response to calls for service to abortion-related conflicts. This includes periodically stopping at common locations of conflict to meet and talk with stakeholders (patients, protesters, clinic employees, neighbors, etc.). These contacts will allow officers to understand the concerns of the parties and communicate department policies and procedures before conflict occurs. In turn, these relationships will help officers manage and reduce abortion-related conflict.

Recommendation 12:

Handling the Response

As with planned events, each agency should develop and maintain a response kit for its officers that includes copies of relevant laws and injunctions for use in answering calls for service. In an effort to further diffuse conflicts and tensions among participants, some modifications to traditional methods of responding to calls for service also may be appropriate. Typically, as officers respond to service requests, their focus is on gathering information from the complaining party. If some immediate action is not required, they are then free to leave the scene, usually to respond to some subsequent request. When responding to abortion-related conflicts, however, this approach leaves some participants with the impression that the police are unconcerned with the varying perspectives of the conflict. In several of PERF's site visits, for example, participants expressed the view that officers' procedures for handling calls for service were not neutral. These participants claimed officers who obtained information from only one source were "choosing sides" and that their resulting action—or inaction—was driven by bias.

To minimize tensions during abortion conflict-related calls for service, responding officers should

- use neutral and non-confrontational language (such as Pro-Choice and Pro-Life rather than anti-choice or pro-abortion);
- meet with spokespeople from each of the issue's partisans to determine what allegedly occurred;
- clearly communicate reasons for action or inaction; and whenever possible

- gather any existing evidence of the reported incident or problem. If additional followup to the incident is appropriate, officers should make every effort to obtain any videotape or other physical evidence from the scene that may be available. If further investigation is not necessary, available evidence should be referred to the appropriate liaison officer. This information increases the liaison officer's understanding of the conflict and its parties and assists his or her preparation for future conflict issues.

In each case, any reports resulting from a call for service should be forwarded to the liaison officer, who should follow up on the incident if necessary.

These procedures will establish a consistent response to calls for service and promote enforcement of relevant laws and police policies. These procedures will help strengthen the relationship between participants and police and decrease participants' perceptions of police bias.

Finally, to assist officers responding to calls for service, agencies should not require that all actions receive prior supervisory approval. For example, officers should not be required to call commanding officers to a scene before making routine arrests for established violations, especially if the agency does not mandate approvals for other types of requests for service. While such requirements are intended to ensure uniform and impartial handling of incidents, the more common result is frustration for all parties involved. Each department instead should develop standard and consistent procedures that officers can follow while handling the various issues that might arise. Supervision can then focus on adherence to these agency guidelines.

Discussion

Participants in PERF's focus groups and site visits supported this recommendation with specific discussion on the need to grant officers sufficient authority to manage calls for service. Several participants reported officers often are required to consult their supervisors before taking any action. During this delay (assuming the officer is not discouraged from action altogether), violators and witnesses often leave the scene, which further hinders a response even if permission is received. When the authority to handle routine incidents remains with the responding officer, participants contend responses are more appropriate, timely and effective.

EXTERNAL COLLABORATIONS

For assistance in carrying out its objectives, each department should arrange cooperative working relationships with a variety of external agencies. At a minimum, these should include other members of the criminal justice system who can support and streamline the procedures the department puts into place. The collaborations also should include members of the community who may have knowledge and insights that can be brought to bear on the issues.

Recommendation 13:

Collaboration with Other Police Agencies

To enhance the ability of officers to respond effectively to planned events and calls for service, departments should establish formal relationships with other law enforcement agencies. These relationships will allow agencies to gather and share information about abortion-related conflict in other locations, which may help prepare for visiting demonstrators and protesters. In addition, police can better identify those offenders who demonstrate primarily outside of their local jurisdiction.

Recommendation 14:

Forming Coalitions Within the Religious Community

Police should build coalitions involving the liaison officer and religious leaders from both the Pro-Life and Pro-Choice communities to prepare for and identify dangerous individuals. Case study participants revealed many activists who have become involved in violent crimes were active members of church groups. By collaborating with the police, clergy may help preempt future violence by compelling potentially violent individuals to pursue peaceful activities. Since the clergy also have an obligation to protect individuals who confide in them, ground rules for managing confidential information and identifying, diverting and responding to potentially troubled persons should be established in advance. To avoid misunderstandings, PERF advises that formal cooperative agreements among the participating groups be drawn up.

Discussion

During the Knoxville focus group, Pastor Doug Sager expressed reservations concerning this recommendation. He claimed the clergy have “no affinity for identifying” potentially dangerous individuals. If he did receive information concerning violent tendencies, he added he is “bound to protect their privacy” and cannot violate a parishioner’s confidence.

Most participants in the Dallas focus group, however, supported this recommendation and contended they would notify the police of individuals they considered potentially dangerous. Reverend Flip Benham from Operation Rescue reported his group designates “marshals” at each event to monitor the behavior of their group. If these marshals identify any unacceptable behavior, they confront those individuals and instruct them to modify their actions. Individuals who refuse to cooperate are reported to the police, he advised. Benham added that he supported consulting with the police about individuals who expressed violent ideas, arguing “acts always come from ideas . . . wrong theology inevitably leads to wrong behavior.”

Dallas police representatives also supported this collaborative relationship, contending the Pro-Life and Pro-Choice willingness to cooperate with police has helped reduce violence. Although no arrests can be made until evidence of wrongdoing exists, if identified, the police can monitor potentially dangerous individuals in an effort to prevent future violence.

Recommendation 15:

Collaborations with the Criminal Justice System

Additional collaborative arrangements should be established between police and other agencies tasked with criminal justice system responsibilities. These include the following:

- *Legal liason.* Officers should meet with local public defenders and public advocate groups such as the American Civil Liberties Union (ACLU) and the Center for Law and Justice to resolve issues for litigation likely to result from abortion-related events;
- *Judges.* When necessary, officers should coordinate with local judges to facilitate the procedures for handling demonstrations. In some cities, judges are willing to cooperate with police by keeping participants from returning to demonstrations;
- *Local prosecutors.* Officers should work with prosecutors to develop procedures for managing events and building cases;
- *U.S. Attorneys.* To prosecute FACE and other relevant federal laws successfully, officers should communicate with U.S. Attorneys and develop procedures for case building; and

- *Jails.* By coordinating with jail administrators, officers can facilitate the arrest process by ensuring adequate space is available during large events.

Through these collaborations, officers will help develop successful cases against violent offenders and civilly disobedient activists while reducing the impact of events on the criminal justice system.

Recommendation 16:

Communications with Other Interested Parties

The police also should communicate regularly with business owners and residents in areas affected by abortion-related conflicts. These information exchanges may give officers additional perspectives about conflicts and community concerns.

In communities with consistent and severe abortion-related issues, the services of community-based mediators also may be available. These mediators could reduce or complement police involvement in situations that officers prefer to avoid while offering a separate, non-law enforcement avenue for dealing with heightened tensions. By establishing these relationships, officers may help reduce community tension and future violence.

ISSUES OF IMPARTIALITY AND BIAS

The police should be aware of events, procedures and responses that can lead to the introduction or perception of bias. Examples range from the methods used to gather statements when responding to calls for service to officers accepting free coffee from participants during an event. Police officers must be balanced in their responses. Toward this end, more effort to remain impartial will be required of officers than would normally be expected for other incidents or settings.

Recommendation 17:

Officers as Stakeholders

Recognizing that many officers may hold personal beliefs on the abortion issue itself, agencies should develop strategies to prevent these personal beliefs from intruding into officers' job performances. The goal of these efforts should be to protect officers' First Amendment rights to express their views while requiring them to perform their jobs impartially. Agencies should include policies that outline the official position for the assignment of these officers to tactical responses.

There may be a rare occasion when an officer's personal beliefs bring into question his or her ability to enforce the law impartially. In these occasions, supervisors should determine if the officer's involvement in specialized duties should be minimized. At the same time, police officers must recognize that there may be occasions when enforcing the law is difficult, but—as professionals—they must be held to a professional standard. The Dallas and other police departments have clauses in their policies that allow for these exceptions, but they have seldom been invoked and have not resulted in significant staffing issues or difficulties.

**Recommendation 18:
Security at Clinics and Events**

Police agencies should carefully consider the question of off-duty employment of officers by clinics or by Pro-Life or Pro-Choice organizations. Participants from all sides reported that, at the least, such employment can create a perception of officer bias. In managing issues of conflict related to abortion, such a perception may be problematic since, in such situations, officers need to be able to maintain effective communication and relationships with all stakeholders. Any appearance of bias, such as the impressions left by regular employment of police by one party or special interest, could potentially compromise that ability. As Fyfe (1993) explained the issue more generally, if officers are to “avoid criticism or adverse responses by third parties, they must be greatly concerned not only with *doing* the right thing, but also *appearing* to do the right thing.”

Aside from perceptions, there is also potential for real bias to affect officers' actions since those who work off-duty for either clinics or advocacy groups may develop loyalties to their employers. These loyalties may influence officers' abilities to remain impartial when responding to abortion-related conflicts. As such, to ensure neutrality we recommend that agencies prohibit such off-duty employment.

Recognizing these neutrality issues, the Dallas Police Department (1997) has implemented an off-duty officer policy to regulate such secondary employment. In their policy, officers are prohibited from working for

a person or entity engaged in a labor dispute or in a political or ideological controversy where the officer's off-duty employment reasonably may be construed as an endorsement or condemnation by the Department of a position taken by either party to the dispute or controversy.

A CONFLICT OF RIGHTS

The department contends letting officers work off-duty for those entities gives the “perception that [the department] is not neutral” and that it “owes [its] allegiance to whomever is paying [it] at the moment.”

In some jurisdictions, we recognize a prohibition policy may not be appropriate. For example, some known threat may exist that the police believe local private security sources inadequate to address. Similarly, we are aware that in some jurisdictions, private security may be unavailable or local policies or labor agreements restrict the ability of police administrators to impose such limitations on off-duty employment. In such cases, we recommend that outside employment be governed by the following guidelines:

- *Matched employment.* If possible, agencies should restrict off-duty employment to planned events or occasions where participants on both sides of the issue have similar hiring opportunities.
- *Payment for off-duty work.* Payment from the off-duty employer should be made to the city or local jurisdiction rather than to the officer directly. For its part, the police agency can then assign officers to these off-duty jobs on a voluntary, rotating basis and supervise their performance to ensure their neutrality. No money should be exchanged between the officer and his or her secondary employer.
- *Restrict use of uniforms and police equipment.* Many agencies require off-duty officers to wear their police uniforms—a decision that site visit participants and focus groups repeatedly claimed exacerbated tensions and increased questions about police neutrality.
- *Restrict the regularity of employment.* The extent of off-duty employment by one group or agency should be monitored, rotated and regulated. During our site visits we found examples of decades-long employment of a single officer by one group. Restrictions may help prevent officers’ excessive loyalty to a secondary employer.
- *Limit the areas in which employment is allowed.* If possible, agencies should restrict patrol officers from off-duty employment by those to whom they may respond to calls for service.

Restricting officers from working at locations in their own areas of immediate responsibility will at least reduce the perception of and potential for bias.

When communicating these guidelines to officers, departments should emphasize that while off-duty, officers may enforce only applicable laws and city ordinances—“house rules” are the responsibility of the employing party. These guidelines will help ensure officers do not become “agents” for one party in the issue, enforcing that group’s preferences and rules.

Discussion

Pro-Life and law enforcement representatives at PERF’s site visits and policy meeting in Washington, D.C., supported a recommendation to prohibit off-duty employment by both clinics and demonstrators. The Christian Defense Coalition and other Pro-Life representatives felt there could not be “neutrality when [officers] were on someone else’s payroll,” and the issue of security (generally at clinics) was a business concern. As such, they argued, off-duty protection from officers who are supposed to be impartial is not justified. Law enforcement representatives agreed off-duty employment by stakeholders could compromise the neutrality of the officers since they are “not really off-duty . . . [I]n uniform they have all the powers and responsibilities of police officers.”

Pro-Choice participants, however, expressed concern about this recommendation, noting clinics must hire off-duty officers because they often have no alternatives available. Many clinics, especially those in rural areas, they added, “do not have the luxury of hiring security.” This difficulty increases after an incident of abortion-related violence because security agencies often claim clinics are “too dangerous to guard.” Because of these factors, they argued clinics must rely on off-duty officers for the safety of their patients and staff and the ability to do so is not a business concern, but a “safety concern.” Unlike most security guards, officers’ superior training and expertise makes clinic staff and patients feel safe. Thus, the Pro-Choice representatives felt it would be “irresponsible” of PERF to recommend that departments prohibit off-duty officers from working at clinics.

Some police employees who were interviewed also opposed this recommendation. In several telephone interviews, these officers claimed this recommendation would unjustly restrict the off-duty employment rights of officers. These officers asserted suppositions

of bias without evidence of wrongdoing formed the basis of the recommendation.

Finally, the police who were opposed to this recommendation also took the position that officers should and could perform their jobs in an impartial manner—regardless of the identity of their secondary employers. According to these individuals, having clinics as secondary employers would not compromise their ability to protect the First Amendment rights of other stakeholders since requests for police intervention pertain to violations of the law. Some officers argued that if demonstrators were exercising only their constitutional rights, the police would not have received a call for assistance. With this assertion, these officers claimed police do not use discretion when responding to the call for service, since their duty is to record a complaint from one of the parties.

PERF's Response

Although those opposed to this recommendation offer strong arguments, PERF concluded that recommendations to restrict off-duty employment are justified. To manage abortion-related conflicts, officers must mediate among the parties and understand their concerns. To do so, officers must maintain an impartial identity and standing. Without broad-based support, the police cannot build a relationship with the parties involved in the abortion conflict or any other controversy. Consequently, the perception of bias hinders the ability of the police to mediate, which may exacerbate the tension in abortion-related conflict situations.

Claims that this recommendation unjustly restricts the rights of officers are not persuasive. The public holds certain professionals, such as teachers and law enforcement officials, to a higher standard (Hill and Wright 1993). With these standards, the public requires “more from its members than” the public expects “from the general population” and scrutinizes any outside employment or activity that tarnishes the image of the profession (Vicchio 1996). Regardless of any actual wrongdoing in these activities, it is the “*appearance* of wrongdoing [bias]” that affects the image of the profession (Klockars 1997). Although these professionals may feel these expectations are unjust, society expects them to “exhibit strong and exemplary models of sensitive behavior to the inconsistencies among the people they serve” (Hill and Wright 1993). Consequently, agencies employing these professionals must implement policies to prohibit any activities that compromise the agency's standing (Burton 1997).

Many agencies also prohibit officers from working in bars or establishments with liquor licenses because of similar conflicts of interest that may result between their secondary employer and the police department. The Baltimore County Police Department, for example, restricts officers from working in alcohol-related establishments because of the “heightened potential for misconduct.” That agency argues that many narcotic and gambling violations occur in these establishments, which forces the off-duty officer into the difficult position of either acting against his or her (secondary) employer’s wishes or ignoring the occurrences. The department also claims allowing officers to work in alcohol-related establishments tarnishes the image of the profession and creates the *appearance* that officers are engaging in wrongdoing (such as consuming alcohol while on-duty).

Many departments also prohibit employment in alcohol-related establishments to avoid conflicts between public and private interests. For example, when noticing a suspicious vehicle, off-duty police officers providing private security will often call the police station to run a database search on the license plate. Where that serves the public interest, few people would object. Since officers have constant access to these government resources, however, they can use the “powers of the badge” for private interests as well. When this occurs, these officers become partial to their employer and cease serving the public good.

Although the security needs of clinics are important, the necessity for neutrality and its appearance also are important if the police are to gain the cooperation of stakeholders from all perspectives. The police must provide equal protection to each citizen and must balance their resources among the communities’ interests and needs. Officers working off-duty for clinics or protest organizations unjustly allocate public resources to one party of the dispute and jeopardize neutrality. In doing so, they also may isolate themselves from other competing interests that may be important to their broader mission. These assertions, however, do not minimize a clinic’s need for safety and security. Numerous security agencies offer protection for businesses with safety concerns.

Finally, the argument that without off-duty officers, security will otherwise be unavailable, is not convincing. Given that the police reflect the values and views of the communities they serve, the fact that officers are available to work as security agents for partisans in the debate suggests others from the private sector will be available as well. Indeed, the availability of qualified personnel to meet medical and legal needs is certain to be a far more pressing concern.

Recommendation 19:

Safety Tips and “Target Hardening” for Stakeholders

The importance of security for all stakeholders should not be understated. PERF recommends that communication about security concerns occur regularly between police and stakeholder groups. Knowledge of specific security issues will help the police provide services that prevent crime and improve public safety. Unfortunately, site visits revealed clinic staff are often unaware of measures they could implement to increase their security, even though, in many cases, the local police were available to perform security “audits” and offer advice. Such audits can assist local clinics with safety and target hardening tips while familiarizing police with each clinic’s physical layout, entrances, exits, and security strengths and weaknesses. This knowledge could be critical in the event of an emergency at a clinic in which an expedient police response is required (e.g., bombing, clinic invasion). Arrangements for technical assistance, security audits and consulting on methods of crime prevention through environmental design (CPTED) should be made by the liaison officer as necessary. Security advice to the clinics may include

- installing bullet-proof glass and other target hardening measures;
- using intercoms for admission into clinics;
- documenting suspicious events and individuals by videotape or photograph;
- developing secure methods of access for doctors and other clinic staff; and
- using non-traceable transportation for doctors (i.e., registering vehicles in the clinic’s name).

Similarly, security advice should be provided to Pro-Life organizations, demonstrators and their facilities. Examples include

- documenting suspicious events and individuals by videotape or photography;
- arranging for police escorts during large marches;

- selecting demonstration sites that do not place participants in traffic patterns and blind spots; and
- installing alarm systems and/or hiring private security at organization headquarters and crisis pregnancy centers.

In each case, officers should hold regular meetings with partisan staff to share these techniques and should encourage each to hire private security. Ultimately, however, each is responsible for its own security.

CONCLUSIONS

Police agencies should use these policy recommendations to establish clear guidelines regarding abortion-related events, demonstrations and responses to calls for service. These guidelines should outline acceptable behavior for the abortion conflict participants and explain the consequences of violating these specifications. In developing these rules and procedures, departments should consult the community and other interested stakeholders, and consider the multiple goals they must balance to address abortion-related conflicts. When responding to these situations, police need to protect the constitutional rights of the Pro-Life and Pro-Choice activists while mediating conflicts that may arise between the parties. Officers must safeguard clinics (since they are a legal business), the rights of clients to enter a clinic safely without harassment and the rights of surrounding business owners and residents, all while protecting the rights of citizens to peacefully protest at these locations. By establishing a structured response to abortion-related events and demonstrations, the police can effectively reduce abortion clinic-related conflicts.

NOTES

1. In this summary, conflict and violence includes the full range of abortion-related activities—from protest to violent acts.
2. As applied in this context, pain compliance does not include standard police come-along holds often employed by police to escort resistant suspects.

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