



Police Describe Efforts To Prevent "Flash Mobs" PAGE 3

Vol. 24, No. 5 | June 2010

When Officer Safety and Police "Legitimacy" Collide: The Gates/Crowley Case

POLICE SHOULD STRIVE TO INCREASE THEIR "LEGITImacy" in the eyes of the public, according to the Cambridge Review Committee, a panel formed by Cambridge Police Commissioner Robert Haas following the arrest of Harvard Professor Henry Louis Gates, Jr. on July 16, 2009. Legitimacy is defined as the extent to which people believe that laws are just and the police enforce the law fairly. But efforts to increase this sense of legitimacy can conflict with officer safety and tactical considerations, and safety must take precedence, the Committee found.

The Committee's mission was to identify lessons learned from the July 16th incident—not only for the Cambridge Police Department, but for other police agencies nationwide. PERF President Charles Ramsey served on the 12-member panel, as did U.S. Senate Sergeant at Arms Terrance Gainer and Louis F. Quijas, former FBI assistant director. PERF Executive Director Chuck Wexler was chairman of the Committee.

The Committee's final report, submitted to Commissioner Haas on June 15, stated that Professor Gates and Sergeant James Crowley, the arresting officer, both missed opportunities to ratchet down their encounter and end it peacefully.

"The Committee believes that the incident was sparked by misunderstandings and failed communications between the two men," the report said. "Sergeant Crowley was responding to a 911 emergency call about an unknown and potentially dangerous situation—a reported breaking and entering in progress. His training and experience gave him reason to be cautious. Professor Gates was also wary—of the police.



TOP: Philadelphia Commissioner Charles Ramsey. BOTTOM LEFT: Louis F. Quijas, former FBI assistant director. BOTTOM RIGHT: U.S. Senate Sergeant at Arms Terrance Gainer.



He did not recognize Sergeant Crowley's concerns or why the Sergeant wanted him to step outside his own home."

"However, once Professor Gates showed Sergeant Crowley his identification and Crowley explained why he was at Gates' home, the behavior of both men should have begun to change. But instead of deescalating, both men continued to escalate the encounter."

The July 16th incident is far from unique, the committee noted. Every day, police departments across the country have thousands of encounters with community members in which misunderstandings generate conflict. Finding ways to understand the nature of these conflicts and improve communications is critical to the future of policing, the report said.

"The point of improving communications is not simply that it would be 'nice' if everyone could get along better," the Commit-

tee concluded. "The importance goes far deeper, to a question that is at the heart of effective policing: How can police gain the strong levels of community backing that they will need to fight crime and prevent terrorism in the coming years? By applying the lessons learned from the July 16th event, police can develop stronger support in the community. Working with the communities they

>> continued on page 4



FROM THE PRESIDENT Moving Forward in Times of Economic Crisis

By Charles Ramsey

"Layoffs Could Follow SFPD Cuts," reads a June 18th

headline from the San Francisco Examiner. The writer continued: "The department, with 2,277 full-time positions budgeted, is widely seen to have improved since Gascón took over in August. Homicides and other violent crimes are down. Gascón overhauled the department's operations, restructuring command staff and district stations. The department has greatly reduced overtime spending. This fiscal year's OT is at a historic low of \$12.7 million and is proposed to decrease to \$7.7 million next fiscal year. Other cuts include retirement of officers and the postponement of a Police Academy class."

The above article could have been excerpted from any number of newspapers reporting on the economic state of police departments nationwide. The language by now is all too common amongst local governments, which are facing ever-growing steep deficits, and scrutinizing their public safety budgets in search of savings and efficiencies. Police departments must continue to fulfill their public obligations yet do so under enormous budget pressures.

Recently, PERF distributed to its membership a "Survey on the Impact of the Economic

Recession on Crime and Police Budgets" to examine how the economic crisis is affecting the ability of law enforcement to provide services in their jurisdiction. The survey asks a number of questions that will allow PERF to share strategies that police executives are currently employing to help mitigate the effects of police budget cuts. We hope to have these results back to our membership in the next couple months.

Much larger questions, however, remain at the center of this debate. How should we position our departments now so that we are ensuring the best possible outcome for our respective communities in the future? What steps do we need to take to support our core mission in light of the current fiscal climate? Will changes made today be sustainable in the future? One thing is certain: The ripple effect of the economic crisis has changed how many of us provide police service.

Many of us are stretched to capacity because of the fiscal crisis. We can no longer afford to treat crime and disorder through



Philadelphia Police Commissioner and PERF President Charles Ramsey

saturation patrols or using massive amounts of overtime. We don't have the staffing or the funds available. However, through evidencebased efforts and targeted approaches to very specific crime problems, we can strategically deploy our personnel in order to maximize our resources. This knowledge often comes about as the result of research collaborations with academic institutions. We have to be willing to spend the time in partnering and learning

> about what works so that we can make informed decisions regarding staffing. Leveraging research is a key component to policing smarter in this economy.

> As a result of community policing, we have already formed partnerships with other municipal agencies, such as streets and traffic, license and inspections, social services and violence prevention programs. These collaborations have proven to be an important step in creating efficiencies while improving the quality of life for our residents. It is not a coincidence that often the same neighborhoods that are the most crime-ridden are also the most impoverished, disor-

ganized and in need of the same essential city services listed above. As government organizations, we are all working in the same neighborhoods time and time again, and it makes sense to do so in a more coordinated and thoughtful manner.

We can also look to other efficiencies in our respective departments, such as maximizing technology to reduce redundancy, soliciting grants, redistributing forfeiture funds, consolidating units that perform like functions, or redeploying personnel where we need them the most. Collaborations with other law enforcement agencies and fusion centers will become even more important as we continue to streamline our operations.

None of these ideas are new. Most of us have already implemented many, if not all, of these measures in order to counterbalance our scaled-back budgets. The PERF survey will provide the opportunity to share more ideas that can assist all of us with getting through these challenging times without jeopardizing our core mission.

Police Describe Efforts to Combat Destructive "Flash Mob" Phenomenon

By Daniel Kanter

SOCIAL MEDIA SITES SUCH AS TWITTER, MYSPACE, Facebook, and YouTube are having the unfortunate side effect of giving young people new ways to coordinate dangerous behavior in cities across the country, according to participants in a session at PERF's 2010 Annual Meeting in Philadelphia. Police departments are devising specific enforcement and prevention strategies to address this issue.

The exact nature of the behavior differs from city to city, but in each instance offenders, usually teenagers, use social networking sites to plan a disruptive or criminal event. The best-known example of this trend is the "flash mob," a phenomenon in which several hundred teenagers will suddenly descend upon a particular location in a city and start partying. The sudden influx of rowdy teenagers can overrun the area's normal police presence, and the parties sometimes spin out of control. Property damage and injuries can result.

To a bystander, the event can appear spontaneous, but in reality, it has been planned well in advance, with organizers relaying directions to participants via social networking sites. "It's a flash to us, not to them. They know what's coming," explained Deputy Commissioner Kevin Bethel of the Philadelphia Police Department. Philadelphia is one of several cities that have experienced destructive flash mobs in the past two years.

A PHENOMENON OF THE YOUNG

Flash mobs participants tend to be quite young. Deputy Chief Cy Ritter of the Kansas City Police Department estimated that 90 percent of the flash mob participants in Kansas City are between the ages of 10 and 17.

In Philadelphia, flash mobs are organized by "social clubs," groups of teens who compete to see who can throw the biggest "party." The clubs have their own names, colors, and logos, and often proudly upload footage of their parties to YouTube. The club's intent is not destruction, but rather to maximize attendance. Bigger parties mean more street cred and more attendance fees for the host club.

Most flash mob participants are looking to have fun, not commit crimes, but flash mobs can become dangerous. According to Deputy Commissioner Bethel, flash mobs are easily "hijacked" by certain individuals looking to bring an element of destructiveness. A recent flash mob in downtown Philadelphia caused \$700 of property damage to a Macy's department store.

The mobs pose risks to police officers as well. Some participants videotape themselves harassing police officers or trying to goad officers into overreacting. "We have to stress to our officers that at these flash mobs, they are being videotaped," Deputy Commissioner Bethel explained. "The kids want to catch officers doing something aggressive so they can put it up on YouTube."

Police departments are developing specific policies to deal

with flash mobs. Chiefs emphasized the need to send a message that participation in destructive activities will not be taken lightly. "We had to set a tone that we would not tolerate this behavior," said Deputy Commissioner Bethel. The Philadelphia police set that tone by making significant arrests at the scene of the incident.

It can be difficult to distinguish between innocent partygoers and destructive offenders in the same crowd of 1,000 teenagers. Even though Philadelphia officers wanted to send a message that criminal activity would not be allowed, they stressed the importance of arresting only wrongdoers. "If kids come down and act in a lawful manner, I won't take any action," Deputy Commissioner Bethel said. Philadelphia Police Commissioner Charles Ramsey agreed, adding that indiscriminate mass arrests were not part of



LEFT: Philadelphia Deputy Commissioner Kevin Bethel. RIGHT: Kansas City Deputy Chief Cy Ritter.

the strategy. "We could articulate the specific offense for each suspect we arrested," he explained. "I think it's very important that you not get caught up in big sweeps."

In order to control flash mobs, police need to be able to respond quickly. Both the Kansas City and Philadelphia Police Departments have mobile response units that can swiftly be deployed at the incidents. Philadelphia has also made a concerted effort to monitor MySpace and YouTube for "chatter," allowing them to predict the time and place of the next incident.

Other agencies of the Philadelphia justice system also understood the seriousness of flash mobs and joined the Police Department in sending a strong message to offenders. In one instance, a teenager arrested during a flash mob who was openly disrespectful to his presiding judge received a three-year prison sentence. Deputy Commissioner Bethel described that sentence as having a "ripple effect" through the community.

>> continued on page 6

serve, police can reach more favorable outcomes on traffic stops, calls for service, anti-crime initiatives, and other encounters with residents."

Cambridge Review Committee Members

Chairman Chuck Wexler, Executive Director, PERF

Stacy Blake-Beard, Associate Professor of Management, Simmons School of Management

Marian Darlington-Hope, Assistant Professor of Human Services and Nonprofit Management, Lesley University

John Farmer, Jr., Dean and Professor of Law, Rutgers School of Law; former New Jersey Attorney General

Terrance Gainer, United States Senate Sergeant at Arms

John Gallagher, Assistant U.S. Attorney, Philadelphia

John Kosko, School administrator (retired) and community leader, Cambridge, Mass.

Tracey L. Meares, Deputy Dean and Professor of Law, Yale Law School

Jack McDevitt, Associate Dean for Research and Graduate Studies, College of Criminal Justice, Northeastern University

Aaron David Miller, Public Policy Fellow, Woodrow Wilson International Center of Scholars, Washington, D.C.

Louis F. Quijas, President of North American Operations, Datong Electronics; former FBI Assistant Director, Office of Law Enforcement Coordination

Charles H. Ramsey, Commissioner, Philadelphia Police Department

EXCERPTS FROM THE REPORT

Following are excerpts from Missed Opportunities, Shared Responsibilities: Final Report of the Cambridge Review Committee. These excerpts focus on the Committee's findings and recommendations that could apply to many police agencies, not just the Cambridge Police Department.

The full text of the report is available online at http:// www.cambridgema.gov/CityOfCambridge_Content/documents/ Cambridge%20Review_FINAL.pdf.

"LEGITIMACY" AND PROCEDURAL JUSTICE

Many people have observed that the Gates arrest was like a national Rorschach test; nearly everyone has a strong opinion about it, and these opinions often seem to be based more on what people read into the incident than on their knowledge of the July 16th incident itself.

The Cambridge Review Committee believes that the encounter between Sergeant Crowley and Professor Gates resonated with many law enforcement officers and members of the public because it implicated the concept of "legitimacy" in the field of policing, criminal justice, and other institutions that exert authority over people. The extensive research in this area, led by Professor Tom Tyler of New York University, involves exploring why people choose to accept—or resist—the decisions made by others, and why people do or do not defer to authority. It is, accordingly, an appropriate subject with which to begin the discussion of the July 16th incident.

Social psychologists use the term "legitimacy" to describe the judgments that ordinary citizens make about the rightfulness of police conduct and the extent to which they support the police department or other government agencies. A judge can determine if a police action was lawful, and a police supervisor can determine whether an officer acted within the bounds of departmental policy. But citizens will form their own opinions about whether they view the actions of an officer as measured or excessive, as impartial or discriminatory.

That is not to say that appearances tell the whole story, or that appearances can never be deceptive. There may be situations in which an officer's actions may not appear "legitimate" to some members of the public, but were nevertheless the right thing to do. Officers must be trained to do what is right, not what appears to be right.

A key element of police legitimacy is whether the police provide what researchers call "procedural justice." This term encompasses not just whether a person believes that a law is fair and that police enforce it even-handedly, but also whether the police officer *treats a person with dignity and respect.* Indeed, some research has shown that people's feelings about an encounter with the police can depend more on procedural justice (e.g., whether they believe the officer was respectful and courteous) than on the actual outcome (e.g., whether they received a warning or a citation). Researchers [also] have demonstrated that increased perceptions of legitimacy not only lead to greater understanding between officers and citizens, but also to higher levels of voluntary compliance with the law, which in turn leads to less crime and fewer opportunities for incidents that put officers at risk.

There is one simple reason for police officers and police departments to aspire to legitimacy and procedural justice: Police need public support to do their jobs. As one police executive on the Cambridge Review Committee put it, "We can only police a community that *allows* itself to be policed."

SAFETY MUST BE GIVEN TOP PRIORITY

Efforts to increase perceptions of procedural justice must give way if they conflict with public safety. For example, officers can facilitate a sense of legitimacy by explaining their actions to community members, but they must also exercise caution and good judgment. There are often good tactical reasons why officers cannot share all the information they possess. Often, officers must be guarded about sharing information about what they are doing until the incident scene is secure, risks are mitigated, and no potential suspects are present.

Discussions of procedural justice must include discussion of how this interest should be balanced against other interests—in particular, the safety of police officers and bystanders, and police tactics for controlling a potentially dangerous situation. The fatal shooting of four police officers in Oakland, California in March 2009 is just one of many examples of officers killed in situations that began with a "routine" traffic stop. As important as it is to advance police-community relations, proper procedures that safeguard officers and the public cannot be compromised.

These are the types of considerations that can be explained in a community meeting or through new types of electronic communications available to police agencies, such as blogs, emails and Twitter messages to residents, and so on. There are many real-world video clips available that can be very instructive on this point—for example, police dashboard camera footage showing seemingly benign motorists who suddenly fire guns at officers, turning traffic stops into fatal encounters.

DE-ESCALATION OF CONFLICTS

The Cambridge Review Committee believes that police should be better trained to understand that:

- Police have a significant amount of discretion in how they respond to encounters with members of the public,
- Encounters with members of the public are dynamic, and changes in the situation should guide appropriate changes in what officers say and how they say it, and
- When police believe they are not in physical danger, they generally should de-escalate tensions.

In some cases, de-escalation also can be a tool for helping to reduce danger by calming a person who is upset or unstable.

Police officers should be trained in a continuum of options for de-escalating encounters, just as they are trained in a continuum of options in the use of force. As one member of the Committee expressed it, "De-escalation needs to be seen as one of the tools that officers can pull out of their toolbox to defuse a situation."

For their part, community members should understand that when they are in the midst of an encounter with a police officer, they should strive to de-escalate any perceived hostility by complying with the officer's instructions and responding to the officer's inquiries, trusting that the officer must do his or her job and recognizing the inherent risk that officers face in many situations.

Even though the Committee emphasizes that its recommendations apply both to the police and the community, it also believes that officer training must also recognize the reality that officers cannot always *expect* members of the public to be reasonable and supportive. Ideally, police officers and civilians alike will conduct themselves reasonably and be willing to de-escalate potentially tense encounters. But if the citizen does not do so, the officer must be trained to take the higher road and always work to de-escalate hostilities and communicate reasonably.

OFFICER DISCRETION

Questions of officer discretion are at the heart of any discussion of how police relate to their communities, because it is in the discretionary "gray areas" that residents are most likely to develop negative feelings about the police if they do not understand why the police act as they do. Typically, the more serious the crime, the more likely it is that an arrest will be made. An officer is often expected to make decisions on a discretionary basis regarding whether to make arrests for less serious offenses, such as disorderly conduct, public intoxication, loitering, loud music, disturbing the peace, and even littering. These offenses are not necessarily inconsequential; they can impinge upon the good order of a neighborhood and can harm the quality of life for the residents. Indeed, officers' ability to conduct "problem-solving" to deal with such conditions is at the core of community policing. In these circumstances, the officer considers, among other things, what harm must be addressed and whether an arrest is the best means to correct the harm and, if so, at what cost.

For instance, community patrol officers might adopt a strict posture toward the enforcement of an "open container" law to address local residents' complaints about loud, boisterous persons drinking in the streets in the early morning hours after nightclubs close. The same officers will likely make an equally appropriate decision to ignore a violation of the same law when they see a man sitting on his own porch at dusk drinking a beer.

One type of law that often involves a high level of officer discretion, and the type under which Professor Gates was arrested, is the "disorderly conduct" statute or ordinance. Courts generally have upheld disorderly conduct statutes, declining to strike them down unless they are unconstitutionally vague. But courts have imposed some restrictions on such laws.

The Cambridge Police Department conducted a detailed analysis of its disorderly conduct arrests in recent years, paying special attention to cases that may have a higher likelihood of being questionable: those in which the officer was the only "victim" of the disorderly conduct (as opposed to cases in which the arrested person was fighting another person or was otherwise involved with other "victims"), and cases in which disorderly conduct was the only offense charged. The Committee believes that the type of analysis conducted in Cambridge would be useful in other police agencies.

THE COMMUNITY'S ROLES AND RESPONSIBILITIES

The success of all efforts to improve police-community communications and relationships depends on the willingness of everyone concerned to act responsibly.

Communities and individuals who have concerns about their interactions with officers and/or the Police Department in general must be willing to bring those concerns, in a constructive manner, to officers. This may be accomplished by contacting the Police Department directly or by raising issues in public forums. Such airing of concerns is essential to bridging gaps between the community and their police.

At the same time, these public forums can serve as opportunities for the police to explain that the time for debate is not when an officer is plainly engaged in the investigation of a crime or a response to a call for service. The public should always honor officers' requests that residents not interfere when they are trying to stabilize a scene, make an arrest, or save a life.

The Case for Police Foundations

By Pamela D. Delaney

THE TIGHTENING OF POLICE BUDGETS IS PLACING police executives in unfamiliar territory. Chiefs are traditionally more involved in securing their portion of tax funds than in generating revenues to offset the costs of public safety. But a new paradigm is emerging in the face of the today's economic challenges, in which police leaders are leveraging private resources to fill budget gaps.

The community policing model encourages police to partner with other government agencies, nonprofit organizations and service providers, and neighborhood residents to fight crime. But private-sector enterprises are often left out of the equation for several reasons, including skepticism about their motives.

Public-private partnerships are widely accepted as legitimate in the fields of education, parks and recreation, and health and human services. I believe it is time to reassess the role of the business community in public safety.

As investors in the communities in which they operate, businesses have a significant stake in effective law enforcement. Business leaders recognize that safe streets drive customer traffic, reduce operating expenses, and facilitate employee recruitment and retention. Businesses appreciate the police role in preventing vandalism, property loss, counterfeiting, theft of intellectual property (trade names and marks, etc.), other crimes, and drug and gang behavior that impacts entire communities. When conditions get too inhospitable, businesses relocate, taking with them jobs, services, and tax revenues and eroding a community's stability.

Private-sector partners have resources and services that can supplement those available to police departments: equipment and hardware, expertise, facilities, and grants among them.

Furthermore, businesses' increasing use of private security makes them a valuable ally in the fight against crime and terrorism. Information-sharing becomes more important as corporations, retailers, manufacturers, and commercial developers invest substantial sums in surveillance cameras, security personnel and data collection to protect their assets.

Take, for example, Faisal Shahzad's alleged attempt to set off a car bomb in Times Square. Among the tools at the disposal of investigators was extensive footage from private security cameras. Police can leverage private security resources by building strong relationships with building managers and security personnel.

The private sector has a significant stake in community safety to protect their investments and grow their businesses. Private businesses can bring transferable knowledge, expertise



Pamela D. Delaney

and new information to help law enforcement deter, detect and apprehend criminals. They have resources of goods and services and funds to bolster police programs.

Police leaders do not need to compromise their integrity or that of their departments to engage in these relationships. The private sector's support for police does not have to present conflicts of interests, undue influence of donors, or expectations of favors and special access. Police foundations, the first public-private partnership for police departments, are uniquely positioned to serve as vehicles for donations from private sources, while helping to safeguard the integrity of police departments. The boards of the best police foundations are comprised of business leaders who offer platforms for dialogue with the private sector as well as legal mechanisms to access extra-governmental resources.

While municipalities—large and small, urban and suburban—have adopted the concept of police foundations with proven success, the potential of this idea is largely untapped. Police foundations can be a formidable force for America's police departments, serving as a voice of the private sector, a long-neglected community partner, and a friendly forum for police executives to articulate their vision and needs. Wise police executive will make time to explore the benefits of a police foundation to forge viable partnerships with the private sector in their municipalities.

Pamela D. Delaney served as President and CEO of the NYC Police Foundation from 1983–2009. For additional information contact Ms. Delaney at pam@ pamdelaney.com.

>> from Efforts to Combat "Flash Mob" Phenomenon on page 3

The Police Department also worked with a local judge to set up a "weekend boot camp" for some offenders from a recent flash mob. The goal of the sentence is both punishment and rehabilitation. The teenagers will spend a full Saturday cleaning up the area where they committed property damage, and will also meet with a vice president of Macy's to discuss their actions and the effect they had on local businesses.

Police departments are also implementing community outreach programs designed to prevent flash mobs from convening in the first place. In Kansas City, Deputy Chief Ritter is planning a meeting between local police, clergy, educators, social services officials, and business leaders to address the issue and discuss ways to keep teens off the streets late at night.

URGING PARENTS TO PAY ATTENTION TO WHAT THEIR KIDS ARE DOING

In Philadelphia, the Police Department contacted Radio One, a popular local hip-hop station and urban media specialist, and convinced the station to air a special message explaining the dangers of flash mobs. Police also reached out to parents, imploring them to monitor their kids' behavior. Commissioner Ramsey explained the thrust of the message: "Your kids can get caught up in something they didn't intend to. You have to pay attention to what they're doing."

Some community groups believe that the Police Department should play a larger role in finding activities to occupy teenagers late at night, but Ramsey said that his department simply doesn't have the resources for such an endeavor. "It's not our job to raise your kids. We don't have the money to set up all the programs they want us to," he explained.



To Our Nation's First Responders...Everything.



Mayors believe this would provide the most effective use of available spectrum, take into account the future broadband needs of public safety and, most importantly, take us one step closer to ensuring the safety of all Americans.

America's Mayors Stand Behind America's First Responders. It's Time for Congress to Join Them. Assign the D-Block to Public Safety.



Paid for by The U.S. Conference of Mayors



BOARD OF DIRECTORS

PRESIDENT Charles Ramsey | Commissioner, Philadelphia Police Department

VICE PRESIDENT

Charlie T. Deane | Chief, Prince William County, Va., Police Department

TREASURER William M. Lansdowne | Chief, San Diego Police Department SECRETARY **Rick Myers** | Chief, Colorado Springs Police Department

AT-LARGE MEMBERS **Edward Flynn** | Chief, Milwaukee Police Department

William Blair | Chief, Toronto Police Service

George Gascón | Chief, San Francisco Police Department EX OFFICIO MEMBER Sir Hugh Orde | President, Association of Chief Police Officers (UK)

EXECUTIVE DIRECTOR: Chuck Wexler

EDITOR: Craig Fischer

The Police Executive Research Forum is a nonprofit association of progressive police professionals dedicated to improving services to all our communities. Subject to Debate, published by the Police Executive Research Forum, welcomes input from PERF members and other interested parties. Please submit articles, ideas and suggestions to Craig Fischer, PERF, 1120 Connecticut Ave., NW, Suite 930, Washington, D.C. 20036. Phone: (202) 454-8332; fax: (202) 466-7826; e-mail: cfischer@policeforum.org. Contributors' opinions and statements do not necessarily reflect the policies or positions of the Police Executive Research Forum. ISSN 1084-7316. Subscription price: \$35/year.



SUBJECT TO DEBATE

1120 Connecticut Avenue, NW Suite 930 Washington, DC 20036 Pre-Sorted First Class U.S. Postage PAID Permit No. 4889 Suburban, MD



When Officer Safety and Police "Legitimacy" Collide: The Gates/Crowley Case

PAGE 1

FROM THE PRESIDENT: Moving Forward in Times of Economic Crisis PAGE 2

Police Describe Efforts to Combat Destructive "Flash Mob" Phenomenon PAGE 3

The Case for Police Foundations PAGE 6