October 8, 2025

Re: IOLERO CAC Canine Policy Recommendations

Dear Sheriff Engram:

Thank you for meeting with the CAC's canine policy ad hoc committee several weeks ago. Robin Jurs and David Jones reported back to the CAC that you, Lt. Kidder and Sgt. Negri engaged in very useful conversation about potential improvements in canine policy. CAC appreciates that exchange and the canine policy changes which followed it. In addition, the CAC appreciates that your Office made modifications to the policy even before your meeting with the ad hoc committee. Your changes have improved policy guidance and requirements in important ways. The CAC recognizes and applauds your work to bring the policy more in line with our mutual interest: greater clarity, transparency, accountability and deputy and community safety.

CAC's canine policy review grew out of three canine apprehension events during 2022 and 2023, following which IOLERO auditors found that canines were released to bite suspects who did not objectively pose immediate threat to deputies. In two cases, IOLERO found that canine bites continued for an excessive period, and deputies were unable to stop canines from continuing to bite suspects for unacceptable periods of time. Those canine apprehensions led to substantial injury, to large liability settlements, and to negative publicity and increased community concern.

Your policy changes both before and after the recent meeting with the CAC ad hoc have provided more "comprehensive and specific guidelines regarding approved methods and devices available for the application of force," in keeping with California law. The following is a list of the CAC's canine policy recommendations. The discussion below identifies positive changes you have recently made to the policy, and states recommendations by the full CAC for your consideration that we feel would be additional improvements to the canine policy.

Recommendation No. 1: Provide a thoughtful, humane mission statement that recognizes that canine force is serious, often does lasting injury, and explains why its responsible, accountable use serves public safety. Following your meeting with the CAC ad hoc committee, your Office added substantial statements to Policy section 309.1 recognizing that canine force is "a serious measure that can cause significant injury." You've coupled that recognition with an express commitment to ensuring that any use of canine force is "judicious" and "accountable," and is consistent with "a respect for human dignity ... safety, responsibility, and service." CAC commends you for making these important statements of mission and purpose to the public and to your staff.

Recommendation No. 2: Define key terms used in canine policy (Policy No. 309) which are currently undefined. The following key terms which govern the handler's authority and decision to release a canine to bite a suspect currently remain undefined in Section 309.6:

- "apprehended"
- "imminent threat of violence or serious harm"
- "violently resisting arrest"
- "in possession of a weapon likely to cause serious bodily injury"
- "serious felony"

- “verbally surrender”
- “adequate resources available to take the suspect into custody”

CAC believes that definitions and/or examples providing a fuller understanding of these terms would lead to less subjectivity, and more consistent decision making by handlers in the field. We hope to see this concern addressed in the future.

Recommendation No. 3: Provide canine-specific guidance for de-escalation, proportionality and crisis intervention. CAC is aware that these subjects are covered in separate Sheriff policies elsewhere, but believes that canine-specific de-escalation tactics which anticipate issues unique to canine force are warranted to better guide handlers in the field. We hope to see this concern addressed in the future.

Recommendation No. 4: Specifically identify permissible tactical purposes for deployment to bite and apprehend a suspect. Canine policy currently describes suspect conduct which warrants the release of a canine to bite, but fails to state how the biting dog is to be used to facilitate taking the suspect into custody. Is the goal to prevent the suspect from using force against deputies? To ensure the suspect is not armed? To allow for handcuffing? To compel the suspect to surrender? A canine should only be released to bite a suspect when its handler can identify a tactical goal which will advance an identified safety concern. We hope to see this concern addressed in the future.

Recommendation No. 5: Provide more specific requirement that canine must be recalled when permissible tactical purpose for deployment has been achieved, or handler determines canine is not effective in achieving it. Only when the policy identifies specific tactical purposes for which canines may be released to bite (as recommended above) can the policy clearly identify when the canine must be called off. We hope to see this concern addressed in the future.

We also note and applaud your addition of important guidance regarding when a canine should be called off, including when a suspect has “verbally surrendered,” “physically complied,” is “actively responding to, and/or following commands” from officers. Importantly, your addition that a handler must consider when the “suspect’s hands are visible and/or it reasonably appears they are not in possession” of a weapon is commendable. CAC thanks you for adopting this valuable new guidance.

Recommendation No. 6: Describe actions the handler must take if the canine does not release bite on command. You have incorporated new policy language which expressly requires handlers to be and remain proficient in “several” release techniques, including verbal release, physical release, utilization of electronic bite collar and the “bite breaker bar” tool is to be applauded. This change provides important guidance for handlers and after-action review.

Recommendation No. 7: Provide policy guidance and requirements for regularly encountered law enforcement scenarios. Canine tactics and control when confronted with a suspect known to be armed, a potentially armed suspect, a concealed suspect, a fleeing suspect, a suspect actively threatening harm, a merely non-compliant suspect, etc., should be treated with greater specificity, so that training and conduct in the field can become more consistent and accountable. We hope to see this concern addressed in the future.

Recommendation No. 8: Provide appropriate admonition that violation of canine policy will subject handler to discipline as would any other violation of force policy. Your

position stated to the ad hoc committee is that it would be unnecessary and counterproductive to call canine force out specifically as a “special case” for discipline, when any violation of SCSO policy provides grounds for discipline. We accede to your judgment on this question.

We also note additional improvements in canine policy since the August 2023 canine policy the ad hoc first reviewed. SCSO canine policy (Sec. 309.6) has added an express requirement that a canine be “continuously evaluated” throughout deployment to assess appropriateness, and that the handler remain in verbal and/or physical control throughout the encounter and maintain visual contact if circumstances permit. We also note that pre-deployment analysis now includes the handler’s assessment of the suspect’s ability to understand and comprehend canine pre-release warnings due to mental health or language differences, as well as the availability of other less-lethal force options. (Sec. 309.6.1.) We also commend these important additions to policy guidance.

CAC recognizes that writing good law enforcement policy is a complex task -- in part because there is a danger of too much, and too little, detail. We commend you for your policy improvements, and for meeting with and considering the CAC ad hoc committee's submissions and suggestions. We also ask that you continue to consider the recommendations we make in this letter which have not yet become part of SCSO canine policy.

You have meaningfully improved SCSO canine policy and guidance in recent months, as summarized above. As a body, and on behalf of the community, CAC thanks you for that work. In the spirit of open dialog on these important issues, CAC invites you or your staff to arrange to attend a future CAC monthly meeting to discuss SCSO canine policy and practice. CAC members and the public would benefit greatly from such a presentation and discussion with you or your staff.

Sincerely,

Lorena Barrera and Nancy Pemberton

CAC Chair and Vice Chair