# County of Fairfax, Virginia

**MEMORANDUM**

**DATE:** September 12, 2025

**TO:** Fairfax County Board of Supervisors

Bryan Hill
County Executive

Tom Arnold
Deputy County Executive for Safety and Security

**FROM:** Todd Heflin
Office of the Independent Police Auditor

**SUBJECT:** Disposition of the Office of the Independent Police Auditor Review for:

IPA-18-13R

IPA-18-14R

IPA-18-15R

IPA-18-17R

IPA-18-18R

IPA-18-19R

IPA-18-20R

As set forth in the Office of the Independent Police Auditor's Procedural Memorandum 04, dated September 11, 2023, the following Fairfax County Police Department ("FCPD") investigations have been reviewed and will not be the subject of a detailed Office of the Independent Police Auditor ("OIPA") Incident Report.[1] This Summary Memo documents this office's reviews of the investigations into complaints that occurred in 2018 but were not provided to the OIPA until May, 2023.

**IPA-18-13R**

At approximately 9:34 p.m. on February 6, 2018, Fairfax County Police Department (hereinafter "FCPD") officers responded to an apartment in Falls Church in reference to a call made by the resident. The caller (hereinafter identified by her initials "C.W.") reported that her son had taken an entire bottle of "Lorazepam," a generic brand of Xanax. C.W. indicated her son had fallen on his head and was having a seizure.

Two FCPD Officers responded to the scene, both were Police Officers First Class (hereinafter "PFC#1" and "PFC#2"). Upon entering the residence, the officers encountered C.W.'s son (hereinafter identified by his initials "A.W.") lying down on the kitchen floor with members of the Fairfax County Fire and Rescue Department (hereinafter "FCFRD") personnel attending to him. A.W. was convulsing and tried to get up from the floor multiple times, but he fell back to the floor each time. PFC#1 observed A.W. being physically aggressive with the medical personnel, resisting their attempts to help him. PFC#1, in an effort to protect the medical personnel, intervened.

PFC#1 began speaking with A.W., telling him to relax so the medical personnel could assist him. At this point, A.W. was on his feet and he approached PFC#1 and placed his right forearm against the officer's chest, pushing against him. A.W. then balled up a fist and began shaking it at PFC#1, telling him to move out of the way. PFC#1 then grabbed A.W.'s arm and utilized a defensive tactics maneuver to take A.W. to the ground. A.W. then tried to punch PFC#1 while on the ground and the officer performed a knee strike to A.W.'s abdominal area to get him to roll over. PFC#1 subsequently placed A.W. in handcuffs.

A.W. was transported by ambulance to INOVA Fairfax Hospital by FCFRD personnel. In addition to treatment for the potential overdose, PFC#1 also sought an Emergency Custody Order ("ECO") so that A.W. could be detained and evaluated for suicidal behavior. A.W. complained at the hospital of his head hurting. Hospital staff conducted a CT scan and an X-ray of A.W.'s head. A.W. was then medically cleared. When C.W. refused to sign documentation allowing A.W. to be held on a longer Temporary Detention Order ("TDO"), the decision was made to arrest him for the assault on PFC#1.

The FCPD initiated an administrative investigation based on PFC#1 informing his supervisor of A.W.'s complaints at the hospital that his head hurt and his allegations that PFC#1 had caused the injury. The FCPD investigation included interviews of both officers, C.W., and A.W.[2] C.W. indicated she did not see PFC#1 strike her son in the head and believed her son had struck his head—prior to the officers' arrival—when he fell through her door and again when he struck his forehead on her fireplace. A.W. indicated during his interview that he was high and confused during the encounter. He also admitted to putting his hands on PFC#1. PFC#2 stated during his interview that he did not witness A.W. being taken to the ground by PFC#1. At no time did he see PFC#1 strike A.W. anywhere near his head.

The FCPD's administrative investigation found, based on statements by C.W. about her son swallowing an entire bottle of Lorazepam and observations of PFC#1 on the scene, that there was probable cause for PFC#1 to initiate the ECO and take A.W. into custody. Further, the investigation found PFC#1's use of force—taking A.W. to the ground and then using a knee strike to gain compliance—was within policy, specifically General Order 540.6 on Less-Lethal Force[3], which authorizes strikes, kicks, or takedowns in situations where the officer is either defending themselves or effecting an investigative stop or arrest. The investigation found no evidence that PFC#1 had struck or otherwise caused the injuries to A.W.'s head.

My opinion is that the FCPD investigation into A.W.'s allegations was complete, thorough, impartial, objective, and accurate. I agree that, based on the results of that investigation, the minimal force used on A.W. was objectively reasonable and, therefore, complied with departmental policy.

**IPA-18-14R**

On June 8, 2018, at approximately 7:30 p.m., Police Officer First Class #1 (hereinafter "PFC#1") of the FCPD observed an individual leave a CVS drugstore on Leesburg Pike in Fairfax County. The individual crossed Leesburg Pike walking toward International Drive. PFC#1 noted the individual was unsteady on his feet. Believing the individual was possibly under the influence of drugs or alcohol, PFC#1 approached him and conducted a subject stop.

The subject (hereinafter identified by his initials "M.B.") became agitated upon PFC#1's arrival. PFC#1 smelled a strong odor of alcohol coming from M.B. and noted that his eyes were

bloodshot. When PFC#1 requested M.B.'s identification, M.B. swore at the officer and said he did not want to speak to him. M.B. took an aggressive stance, blading his body from the officer and clenching his fists. When a second Police Officer First Class (hereinafter "PFC#2") arrived, PFC#1 told M.B. he was under arrest and to turn around, placing his hands behind his back.

M.B. failed to comply with the officer's commands. PFC#1 then placed his hands on M.B. and performed a leg sweep, taking him to the ground. M.B. continued to resist and PFC#2 placed a knee on M.B.'s shoulder blade to help control him. PFC#1 called for additional officers. Three more officers arrived. With the additional officers assisting by utilizing their body weight to control M.B. the officers were able to handcuff him. Upon arriving at the police car for transport, M.B. alleged to PFC#2 that PFC#1 had smashed his face on the concrete and slammed him against the police car. PFC#2 asked M.B. if he needed the FCFRD to respond. M.B. refused this offer.

PFC#1had already notified his supervisor before M.B. made the allegations because of the use of force involved in the arrest. The supervisor arrived on the scene and conducted the use of force investigation. He spoke with M.B. who alleged PFC#1 had slammed his head against the cruiser several times. He did not allege to the supervisor that his face was slammed on the concrete. The supervisor did not observe any physical injuries to M.B.'s face or head and photos of M.B. were taken as part of the administrative investigation.

The supervisor, as part of his investigation, reviewed the in-car video (hereinafter "ICV") camera footage and interviewed all five officers who were on the scene. The ICV footage and statements made by PFC#1, PFC#2, and M.B. during their interviews indicated that M.B. was taken to the ground on a grassy area, not the pavement. Further, there was no evidence that his head was slammed against the police vehicle.

PFC#1 had reasonable suspicion to stop M.B. based on his observations, and upon further investigation, had probable cause to arrest M.B. for being drunk in public.[4] My opinion is that the FCPD investigation into M.B.'s arrest and the subsequent use of force by the officers was complete, thorough, impartial, objective, and accurate. I agree that, based on the results of the investigation, the minimal force used on M.B. was objectively reasonable and, therefore, complied with departmental policy.

**IPA-18-15R**

On June 14, 2018, FCPD Police Officer #1 (hereinafter "OFFC#1") conducted a traffic stop on a vehicle for a red-light violation. The driver (hereinafter identified by his initials "A.L.") could not produce a driver's license and the identification information he did provide to OFFC#1 did not confirm the individual's identity. OFFC#1 requested backup, and two more officers arrived, Police Officer First Class #1 (hereinafter "PFC#1") and Master Police Officer #1 (hereinafter "MPO#1"). OFFC#1 requested A.L. exit the vehicle due to the identification issues, but he refused. After multiple verbal requests for A.L. to exit the vehicle, PFC#1 unlocked the driver's side door and removed A.L. from the vehicle by grabbing his shirt and pant leg. He placed A.L. at the back of A.L.'s vehicle. The officers then attempted to handcuff A.L., and he resisted by flailing his arms and trying to walk away. He also threw his head back towards PFC#1's face.

PFC#1 then took A.L. to the ground by grabbing him around the waist and pulling him down. On the ground, A.L. continued to resist and at one point balled his fists up, raising them to the officers. PFC#1 delivered a knee strike to A.L.'s shoulder area. While this got A.L. to lie flat on his chest, he continued to resist both officers but was subsequently handcuffed. After being cuffed, A.L. was seated on the curb near his vehicle. Police Officer First Class #2 (hereinafter "PFC#2") arrived on the scene. A.L. was then walked to a police car and was searched by PFC#1. During the search, he resisted the officer's efforts and complained about the arrest. He was then placed in the back of a police car for transport.

A supervisor arrived on the scene and interviewed all the officers involved, as well as A.L. When A.L. was asked what his complaint was, he stated "these guys roughed me up pretty good." He complained of pain to his side and ribs but refused medical attention. The supervisor also interviewed two civilians who had witnessed the arrest, one of whom had filmed at least part of it. The supervisor asked a bystander who captured a portion of the arrest if he would provide a copy of the video to the police department. He indicated he would and was given contact information for the supervisor. The video was never provided.

After the supervisor documented the use of force complaints from A.L., the FCPD Internal Affairs Bureau (hereinafter "IAB") opened an internal investigation. That investigation included in-car video (ICV) camera footage review and a reinterview of all officers on the scene.

The investigation found the officers involved used reasonable force to detain, arrest, and search A.L., and that the force used was in compliance with FCPD General Order 540.4 on Resistance and Levels of Control.[5]

After review of the FCPD IAB investigation, my opinion is the investigation into A.L.'s allegations was complete, thorough, impartial, objective, and accurate. I agree that, based on the results of that investigation, the minimal force used on A.L. was objectively reasonable and, therefore, complied with departmental policy.

**IPA-18-17R**

On August 21, 2018, an individual (hereinafter identified by her initials "M.S.") filed a complaint with the FCPD IAB alleging assault and kidnapping by an officer at her residence on August 5, 2018.

FCPD Police Officer #1 (hereinafter "OFFC#1") and Police Officer First Class #1 (hereinafter "PFC#1") were dispatched to M.S.'s residence on Ellenwood Drive on August 5, 2018, in reference to a noise complaint. Upon arrival, they spoke with the complainant, who told the officers that a lot of noise was coming from her neighbor's residence and that it was an ongoing problem. The neighbor was identified as M.S. The FCPD previously received over twenty noise complaints in 2018 in reference to this ongoing issue.

The officers watched a video on the complainant's cell phone which documented loud knocking noises and high pitch noises coming from M.S.'s residence. It was determined the high pitch noises were coming from several devices on the property that went off when people would get close to the residence. OFFC#1 spoke with his supervisor about the ongoing situation; and in light of multiple prior warnings given to M.S. for the violations of the Fairfax County noise ordinance, they agreed that M.S. would receive a summons on this occasion.

OFFC#1 and PFC#1 then made contact with M.S. at her residence and informed her they would be issuing her a summons. After OFFC#1 wrote the summons, M.S. became uncooperative and refused to sign it. OFFC#1 explained to her that if she did not sign the summons she would be arrested and transported to the Fairfax County Adult Detention Center. M.S. continued to refuse to sign the summons after being given another chance to do so. At this point, OFFC#1 asked M.S. to stand and turn around to be handcuffed. OFFC#1 and PFC#1 then

took control of M.S. by her arms and began to handcuff her. M.S. then agreed to sign the summons and was released from the officers' control. She signed the summons and was given a copy of it. OFFC#1 informed his supervisor of the events that had transpired.

After M.S. filed her complaint with IAB on August 21, 2018, the FCPD opened an administrative investigation into her complaint. On September 14, 2018, the supervisor spoke with M.S. who indicated she did not feel she should have been issued the summons. After explaining the process to M.S. several times, she indicated she did not wish to speak with him any further and she was provided with his contact information if she had any further questions.

FCPD found that OFFC#1 had probable cause to issue M.S. the summons for a violation of the county noise ordinance. Further, FCPD General Order 601.1, Misdemeanor Arrests/Summons Release,[6] allowed for OFFC#1 to arrest M.S. for refusing to sign the summons, which tracks Virginia state code. FCPD further found that the officer's actions in handling M.S. comported with General Order 540.0[7] in effect at the time of the incident.

After reviewing the FCPD investigation, my opinion is that the investigation into M.S.'s allegations was complete, thorough, impartial, objective, and accurate. I agree that, based on the results of the investigation, the minimal force used on M.S. was objectively reasonable and, therefore, complied with departmental policy and the Code of Virginia.

**IPA-18-18R**

On October 3, 2018, the FCPD dispatched officers to the area of Maidstone Court in reference to a shooting event. Multiple officers arrived on the scene and began searching the area for the suspected shooter and two others who were with the shooter. The suspects had fled the area after the shooting. During the investigation Police Officer First Class #1 (hereinafter "PFC#1") spoke with a juvenile male (hereinafter identified as "the juvenile") about the shooting and a person of interest the police had detained. The juvenile indicated he did not know the individual, and he was released. PFC#1 later determined that the juvenile had made false statements about not knowing the detained individual and asked other officers to look in the area for the juvenile and detain him if possible.

Subsequently, two officers, Police Officer First Class #2 (hereinafter "PFC#2") and an Auxiliary Police Officer (hereinafter "APO#1") located the juvenile in the parking lot of a

nearby shopping center. PFC#2 and APO#1 detained the juvenile and placed him in the back of a police vehicle without handcuffing him. After approximately 10 minutes, PFC#1 arrived and told APO#1 and PFC#2 to secure the juvenile in handcuffs and take him to the Sully District Police Station to speak with detectives from the FCPD's Major Crimes Bureau. The juvenile was handcuffed in front of his body and transported to the station.

The juvenile later told detectives in a recorded interview that PFC#2 slammed him against the wall and then "threw" him into the police car. The juvenile's mother also made the same complaint about her son being slammed against a wall by PFC#2. The complaints of excessive force were investigated by the Sully District Station leadership. ICV camera footage from PFC#2's police vehicle captured the audio—but not video—of PFC#2 and APO#1 approaching the juvenile. After identifying him as the individual they were looking for, they asked him to walk over to the car. The two officers then conducted a pat down search of the juvenile and explained that they were ensuring he did not have any weapons. The ICV camera did capture the officers' legs while they were speaking with the juvenile, and no scuffle or use of force can be detected. At that point, the juvenile sat in the back seat of the police vehicle with no assistance and without handcuffs. After approximately nine minutes, PFC#1 arrived and spoke with the officers, asking them to handcuff the juvenile and transport him. At this point PFC#2 handcuffed the juvenile in front of his body while he remained seated in the vehicle, and he was then transported to the station.

Both PFC#2 and APO#1 were interviewed and advised that no use of force occurred during their detention and subsequent transport of the juvenile. This was corroborated by the ICV camera audio and video footage.

This use of force allegation was one of several complaints made by the juvenile and his parents in relation to his arrest and subsequent interview at the Sully District Station, which was video recorded. After command staff at the station spoke to all FCPD employees involved, as well as the complainants, and after they reviewed available video evidence, they found all complaints to be "unfounded."[8]

My opinion is that the FCPD investigation into the allegations made by the juvenile and his parents was complete, thorough, impartial, objective, and accurate. In particular, the FCPD

was correct in finding, pursuant to FCPD General Order 540,[9] that there was no force used by the officers during the incident and that the complaint of excessive force was, therefore, unfounded.

**IPA-18-19R**

On December 5, 2018, a complainant (hereinafter identified by her initials "A.D.") made a complaint to the FCPD about how her son was treated by an officer from the Franconia District Police Station during a call for service at her house on December 3, 2018. The complaint was subsequently investigated by the station.

On December 3, 2018, at approximately 5:19 p.m., A.D. called FCPD to her residence in reference to her 8-year-old son (hereinafter identified as "the juvenile") trying to harm himself. A.D. indicated she and the juvenile's new counselor (hereinafter identified by her initials "K.B.") were trying to restrain her son to prevent him from harming himself. Police Officer First Class #1 (hereinafter "PFC#1") and Police Officer First Class #2 (hereinafter "PFC#2") arrived at the residence shortly thereafter. Upon their arrival the officers found A.D. restraining her son while K.B. was on the phone with her supervisor, obtaining guidance on what should be done. The juvenile was screaming that he wanted to die and at times needed to be restrained, and at other times he sat on his own without restraint.

PFC#1 stepped outside the residence to make a phone call. While he was outside, the juvenile was being restrained by his mother and PFC#2. At some point he broke loose and began crawling toward an electrical cord. PFC#2 then grabbed the juvenile and placed him on the couch. A.D. alleged PFC#2 swung her son like a baseball bat by the ankles and when he put him on the couch, PFC#2 got close to his face and said, "cut this shit out."

All parties were interviewed as part of the internal investigation. A.D. stated that her son suffered no physical injuries during the encounter. K.B. stated she observed the juvenile break free and begin crawling toward the electrical cord at which point PFC#2 grabbed him with one hand by his ankles and "plop" him on the sofa. K.B. indicated that due to the confined space, it would have been impossible for PFC#2 to swing the juvenile like a baseball bat. K.B. described PFC#2's actions as not being violent. She did see PFC#2 lean toward the juvenile and say something that included curse words, but she would not repeat what he said. She described his actions as "old school methods."

PFC#1 was outside and did not observe the incident. PFC#2 was interviewed and stated that when he observed the juvenile break free from his mother and crawl toward the electrical cord, he grabbed him with one hand by the ankle and one hand around his waist and picked him up, placing him on the sofa. He stated he then told the juvenile to "cut this shit out."

Further investigation revealed FCPD had been dispatched related to the juvenile three times in the past, and A.D. had indicated her son had PTSD and depression, among other issues. She indicated he becomes agitated and threatens suicide and attempts to harm himself. Based on the investigation, the FCPD found PFC#2's use of force in picking up the juvenile and placing him on the couch—so that he could not reach an object which he may have used to harm himself—to be in compliance with FCPD General Order 540 on Use of Force.[10] However, the FCPD did conclude that PFC#2 violated its policy requiring officers to refrain from using "offensive words and language" when he chastised the juvenile.

After reviewing the FCPD investigation, my opinion is that the investigation into A.D.'s allegations was complete, thorough, impartial, objective, and accurate. I agree that, based on the results of that investigation, the minimal force used on her son was objectively reasonable and, therefore, complied with departmental policy; but that the language he used did violate departmental policy.

**IPA-18-20R**

FCPD received an email complaint on December 4, 2018, from a complainant (hereinafter identified by his initials "A.C.") regarding his arrest for being drunk in public. The ensuing investigation was conducted by a supervisor assigned to the McLean District Police Station. The investigator interviewed A.C., who indicated he was epileptic. He advised that on November 28, 2018, he had suffered a seizure, but he did not consider it severe, and he then went to sleep. Shortly thereafter, he began to sleepwalk from his apartment and eventually ended up at the Target store in the Mosaic District of Fairfax County. He indicated his next memory was being surrounded by police officers inside the store. He stated he informed the officers of his epilepsy and when the officers accused him of being intoxicated, he told them he attends Alcoholic Anonymous meetings and had been sober for ten years. He stated he was then grabbed by the officers, placed in handcuffs, and shoved into a police vehicle. He stated that

Police Officer #1 (hereinafter "OFFC#1"), who handcuffed him, was "rough" with him when he placed him in handcuffs and that Police Officer #2 (hereinafter "OFFC#2") shoved him into the backseat of the patrol vehicle.

After interviewing the complainant, the investigator interviewed all officers who had responded to the scene that evening. OFFC#1 was the primary officer and initially was accompanied by two other officers, OFFC#2 and Police Officer First Class #1 (hereinafter "PFC#1"). In addition, three other officers who also eventually responded to the incident were interviewed.

OFFC#1 indicated that when he arrived at the Target store he spoke with Target security officers who were with A.C. on the first floor. OFFC#1 stated the Target security officers had found A.C. on the first floor of the Target near the bathrooms. He was disoriented and had defecated on himself. OFFC#1 then spoke with A.C. and observed that he had a strong odor of alcohol about his person, as well as a foul odor, which A.C. confirmed was from the fact he had defecated on himself. All other officers who interacted with A.C. confirmed these observations. A.C., upon questioning, indicated he had consumed one or two glasses of wine with dinner. He produced identification and was able to inform the officers of his address. He further indicated he had left the keys to his apartment at home. OFFC#1 asked if A.C. had anyone he could contact who could get him back into his apartment, but A.C. stated there was no one at the front desk who could let him inside. After informing the officers he could not get back into his apartment, A.C. asked if he could stay in the common area of the Mosaic District until morning.

When interviewed, OFFC#2 confirmed OFFC#1's observations of A.C., adding that he was swaying in place and was slurring his speech. Although a medical unit was dispatched to meet the officers, it did not arrive on the scene because A.C. advised that he did not require medical attention.

The decision was made by PFC#1 and OFFC#1 to arrest A.C. for being drunk in public, since he did not require medical attention and he could not be left alone due to his level of intoxication. OFFC#1 placed A.C. in handcuffs. PFC#1, PFC#2, and OFFC#2 all observed this procedure and saw nothing excessive about it. A.C. was then moved to OFFC#1's police vehicle where he was searched incident to the arrest[11] and placed inside the vehicle. The officers wrapped a cotton sheet around A.C. and placed a paper barrier between him and the seat due to

him being soiled in feces. The search and placing of A.C. into the police car by OFFC#1, OFFC#2, and PFC#1 was captured on the ICV camera. A.C. had trouble getting into the vehicle, so OFFC#2 can be seen pulling A.C. by his left arm to slide him across the seat to get his legs in the vehicle. At this point A.C. says aloud, "ow."

During the transport of A.C., the ICV camera was also running. The investigator reviewed this footage and while OFFC#1 does not engage A.C., A.C. makes multiple statements as to his condition, indicating he must have been sleepwalking and he believed he had food poisoning from a salad he had eaten for dinner. He then stated he had gone to Target to get medicine for the food poisoning. At no time does A.C. request medical treatment or indicate he is in discomfort. After arriving at the Adult Detention Center (hereinafter "ADC"), the video is turned off. After OFFC#1 obtained a warrant for A.C. being drunk in public, he was taken to the booking desk, where he was asked a series of questions to which he was able to respond. During the medical screening, A.C. is asked if he has any medical conditions that require treatment or if he needs any medication to which he replies in the negative.

Based on the interviews of all officers present and review of ICV camera footage, the FCPD determined OFFC#1 had not used "force"[12] against A.C. during the arrest so the claim that he was roughly handcuffed was unfounded.[13] As to the complaint of pain suffered by A.C. while OFFC#2 assisted him into the police vehicle, the action was found to be in compliance with FCPD General Order 540, Use of Force,[14] since there is no evidence of unnecessary force being used.

While there is no video from inside the Target store, the ICV system captured both the search of A.C. and him being placed in the patrol vehicle. None of the officers interviewed observed OFFC#1 use any force while placing A.C. into handcuffs inside the store, and ICV footage confirms no excessive force is used while placing him in the car. A.C. did not complain of any injuries and he refused medical treatment on at least two occasions, at the scene and later at the ADC. It is my opinion that the FCPD investigation was complete, thorough, impartial, objective, and accurate. Handcuffing a non-resisting subject is not a use of force as defined in FCPD General Order 540.1[15] and the force used to move A.C. inside the police vehicle was minimal and objectively reasonable.

cc: Chief Kevin Davis, Chief of Police - FCPD
Commander John Lieb, Internal Affairs Bureau – FCPD

[1] OIPA Procedural Memorandum 04: Case Intake and Public Reports
[2]Body-worn camera (BWC) footage was not available for this incident. The FCPD did not begin implementing its BWC program countywide until 2020.
[3] G.O. 540 USE OF FORCE, effective March 31, 2017.
[4] Fairfax County Code § 5-1-1.
[5] G.O. 540 USE OF FORCE, effective March 31, 2017.
[6] G.O. 601.1 MISDEMEANOR ARRESTS AND SUMMONS RELEASE, effective July 1, 2012.
[7] G.O. 540 USE OF FORCE, effective March 31, 2017.
[8] G.O. 301 INTERNAL INVESTIGATIONS, effective March 20, 2015. An unfounded classification is defined as "the allegation is false, and did not occur."
[9] G.O. 540 USE OF FORCE, effective March 31, 2017.
[10] G.O. 540 USE OF FORCE, effective March 31, 2017.
[11] Chimel v. California, 395 U.S. 752 (1969), established that a warrantless search of an arrestee is allowed pursuant to that person's lawful, custodial arrest.
[12] Defined in G.O. 540.1 I. G., effective March 31, 2017, as "[a]ny physical strike or instrumental contact with an individual, or any significant physical contact that restricts an individual's movement."
[13] *Supra*, note 8.
[14] G.O. 540 USE OF FORCE, effective March 31, 2017.
[15] *Ibid.*