



2024

Response to Resistance Annual Analysis

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Executive Summary

The Training Section conducts an analysis of all incidents of force to reveal patterns or trends that could be predictive, indicate training strengths or weaknesses, identify the need for training and equipment, and evaluate the need for potential policy revision. The information in this report for 2024 provides transparency, accountability, and a benchmark for which we measure our progress as we strive for continual improvement. Highlights of the 2024 Response to Resistance analysis are listed below:

- In 2024, there were 1,709 sworn deputies employed with the Orange County Sheriff's Office.
- The agency experienced a 17.6% decrease in calls for service and a 12.3% decrease in arrests in 2024 from the previous year.
- In 2024, deputies used force 198 times and made 15,811 physical arrests, which equates to force being used in 1.25% of arrests. This was consistent from 2023.
- Male subjects accounted for 76.53% and females experienced 23.46% of all force used.
- The agency used force on 30 juveniles during arrest incidents, which represents 14.22% of the total 211 response to resistance subjects. The 30 response to resistance incidents is a 3.45% increase from 2023 (29). The 30 juveniles who were subjects of response to resistance represented approximately 2.6% of the 1149 juveniles arrested. For comparison, the rate of force used in 2023, for the 1,207 juvenile arrests was 2.4%.
- There were seven (7) deadly force events in 2024 involving fifteen (15) deputies, which resulted in four (4) subjects being fatally injured. This is an increase from the one deadly force event in 2023 involving four deputies, which resulted in one subject being fatally injured.
- There was one (1) in custody death involving eight deputies in 2024.
- Physical control (weaponless techniques) remained the most common tactic (60.35%), which is an increase from 51.18% in 2023.
- There were 35 electronic control device deployments, which accounted for 15.42% of all incidents of force used in 2024. This was a decreased usage rate of -44.4% from the 63 electronic control device deployments in 2023.
- During the 198 responses to resistance incidents, non-fatal injuries to subjects occurred in 53.03% of all incidents which is an increase of +17.18% from the 35.85% of all incidents in 2023, while non-fatal injuries to deputies occurred in 25.25% of all incidents which is a slight increase of +8.74% from the 16.51% of all incidents in 2023.

Introduction

The Orange County Sheriff's Office is committed to transparency and accountability in all aspects of use of force, also known as response to resistance (RTR). The Orange County Sheriff's Office Training Section conducts an analysis of all RTR incidents. This continuous, critical self-analysis is completed to identify the need for training and equipment and evaluate the need for potential policy improvement.

As with all law enforcement agencies within the United States, deputies serving with the Orange County Sheriff's Office are governed by policy, state law and the United States Constitution in regard to using force. Deputies are provided with a framework of guidelines, called the Response to Resistance Matrix, to aid in making response decisions. The purpose of this RTR Statistical Analysis Annual Report is to further refine deputy responses in the field with the goal of preventing harm to both citizens and deputies.

As part of our commitment to the community we serve, the Orange County Sheriff's Office recognizes our obligation to document, analyze and publicly report data on law enforcement use of force incidents.

In this review, it is important to note that the statistical figures listed for total response to resistance incidents will differ from the annual numbers of response to resistance incidents. In many cases, more than one deputy is required to respond to a subject offering resistance in order to gain compliance or more than one type of response to resistance is used on the same individual. Additionally, not all response to resistance incidents involve an arrest. Examples of incidents where a response to resistance was used against an individual who was not arrested would include: persons who were experiencing episodes of mental health crisis or the effects of substance abuse and were required to be taken into law enforcement custody, and a response to resistance was utilized on a subject who fled from law enforcement and was not apprehended, or incidents that resulted in a fatality.

Service Area Size and Population

The Orange County Sheriff's Office serves visitors and residents of Orange County, Florida. Orange County is the state's fifth most populous county, according to the United States Census Bureau. The number of residents has increased dramatically each year since 2017 with the exception of 2020. The United States Census Bureau reports the population of Orange County, Florida in was estimated to be 1,533,646 permanent residents.¹

¹ <https://www.census.gov/quickfacts/fact/table/orangecountyflorida/PST045223>

The population composition by race/ethnicity was estimated as follows:

Race/Ethnicity	%
White (non-Hispanic)	67.5%
Hispanic	33.8%
Black or African American	22.7%
Asian	6.0%
American Indian or Alaska Native	0.7%
Native Hawaiian or Other Pacific Islander	0.2%

The resident population was estimated, in July 2024, to be 50.8% female residents and 49.2% male residents.²

Orange County hosts millions of visitors each year due to the robust tourism industry resulting from its internationally recognized theme park industry. According to Visit Florida's website, Orange County had an estimated 143 million visitors during 2024.³ This is a .9 % increase from 2023.

Calls for Service, Custodial Situations and Response to Resistance

In 2024, deputies used force in 198 times. This figure includes incidents when the subject fled and was not apprehended, was Baker Acted and subsequently not charged with a crime or the force resulted in a fatality. In 2024, the Orange County Sheriff's Office handled 1,120,199 calls for service, which is an 17.6% decrease from 2023. The rate of force per call for service was approximately 0.018% which is statistically consistent with the previous three years.

In 2024, the Orange County Sheriff's Office made 15,811 physical arrests, which is a 12.28% decrease from 2023. In 2024, the rate of force per arrest was 1.25%, a slight increase from 1.18% the previous year.

This physical arrest figure is defined by someone who was physically taken into custody and delivered to the control of corrections personnel. It does not include incidents of an individual being taken into law enforcement custody under the Baker Act or Marchman Act.

The average rate of response to resistance per call for service and per arrest has remained relatively consistent from 2021 to 2024, with an average of 0.016% and 1.12%, respectively over a 4-year average. This figure has remained steady despite the increased resident and visitor population.

² <https://www.census.gov/quickfacts/fact/table/orangecountyflorida/PST045223>

³ <https://www.visitflorida.org/resources/research/>

Table 1.0
Response to Resistance Incidents per Call for Service and Arrest

	2021	2022	2023	2024	4 Year Average
Annual Calls for Service	1,296,306	1,247,510	1,358,735	1,120,199	1,255,688
Annual Arrests	18,579	17,644	18,025	15,811	17,515
Annual RTR Incidents	212	160	212	198	196
Rate of Force/Call for Service	0.016%	0.013%	0.016%	0.018%	0.016%
Rate of Force/Arrest	1.14%	0.91%	1.18%	1.25%	1.12%

Table 1.1
Total Agency Custodial Arrests

	White		Black		Hispanic		Other		Total
	Male	Female	Male	Female	Male	Female	Male	Female	
2021	3,545 (19.08%)	1,543 (8.31%)	6,662 (35.86%)	1,762 (9.48%)	4,060 (21.85%)	984 (5.30%)	17 (0.09%)	6 (0.03%)	18,579
2022	3,298 (18.69%)	1,458 (8.26%)	6,281 (35.60%)	1,697 (9.62%)	3,860 (21.88%)	1,030 (5.84%)	16 (0.09%)	4 (0.02%)	17,644
2023	3,019 (16.75%)	1,255 (6.96%)	6,836 (37.93%)	1,804 (10.01%)	3,984 (22.10%)	1,090 (6.05%)	29 (0.16%)	8 (0.04%)	18,025
2024	2,745 (17.36%)	1,187 (7.51%)	5,724 (36.20%)	1,608 (10.17%)	3,626 (22.93%)	911 (5.76%)	7 (0.04%)	3 (0.02%)	15,811
Total	12,607 (17.99%)	5,443 (7.77%)	25,503 (36.40%)	6,871 (9.81%)	15,530 (22.17%)	4,015 (5.73%)	69 (0.10%)	21 (0.03%)	70,059

Response to Resistance by Geographical Area

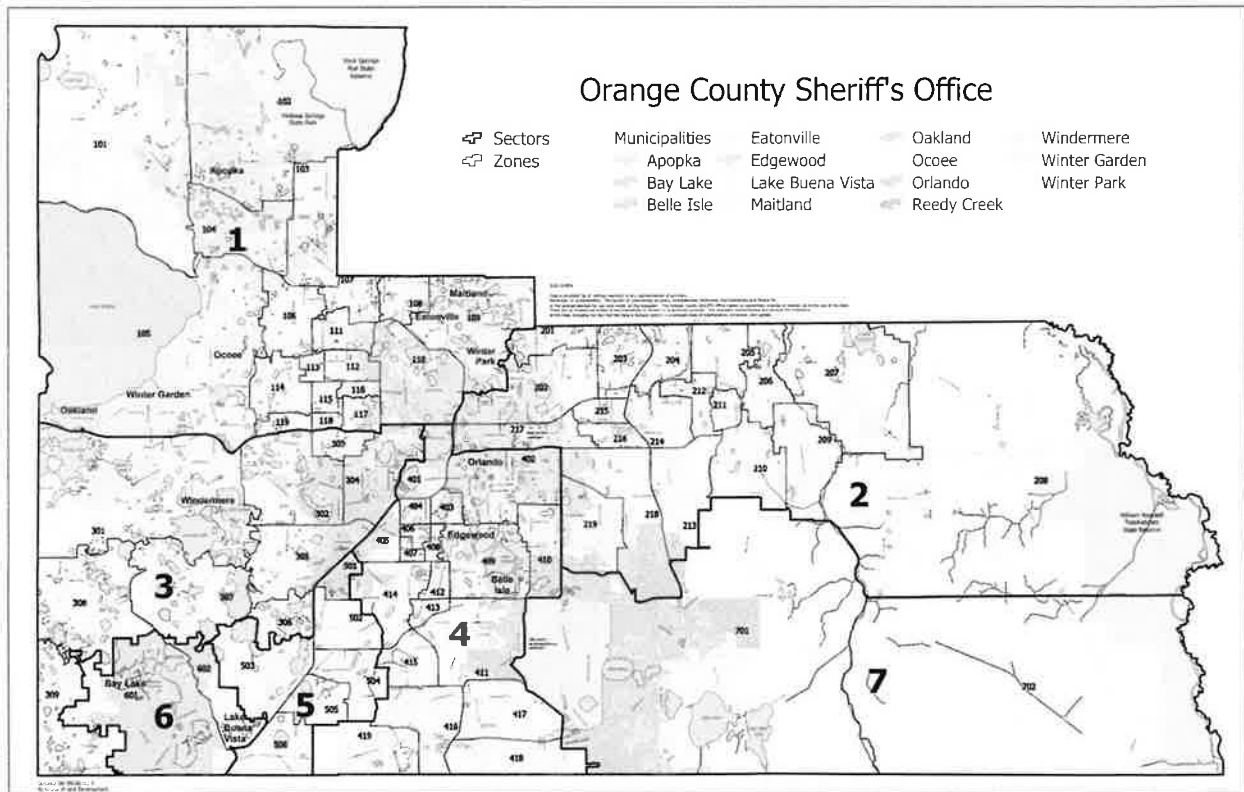
As illustrated in Table 2.0, Sectors 1 and 4 continue to experience the highest incidents of force over the past two years. When averaging the four-year total, Sector 4 accounted for 36.32% of all response to resistance incidents. Of the six geographical sectors, Sector 6 has much lower number of incidents where force is used.

NOTE: Sector 7 was created contemporaneous to the implementation of the agency's transition from Tiburon MobileCOM to Central Square Technology's Mobile⁴. Although it has a different sector designation, as of 2024, Sector 7 was under Sector 2 Uniform Patrol Division command.

⁴ These are computer-aided dispatch software used by the Orange County Sheriff's Office during 2024. Among a host of other functions, the software allowed for tracking and dispatching of calls for service and authoring of law enforcement reports (i.e. incident reports and arrest affidavits).

Table 2.0
Total Response to Resistance Incidents by Sector

	2021	2022	2023	2024	Total	4 Yr. %
Sector 1	22 (13.75%)	14 (6.60%)	42 (21.21%)	46 (23.23%)	124 (15.86%)	
Sector 2	40 (25.00%)	44 (20.75%)	40 (20.20%)	32 (16.16%)	156 (19.95%)	
Sector 3	38 (23.75%)	21 (9.91%)	23 (11.62%)	19 (9.60%)	101 (12.92%)	
Sector 4	69 (43.13%)	60 (28.30%)	85 (42.93%)	70 (35.35%)	284 (36.32%)	
Sector 5	31 (19.38%)	17 (8.02%)	18 (9.09%)	15 (7.58%)	81 (10.36%)	
Sector 6	10 (6.25%)	2 (0.94%)	1 (0.51%)	9 (4.55%)	22 (2.81%)	
Sector 7	0 (0.00%)	0 (0.00%)	1 (0.51%)	1 (0.51%)	2 (0.26%)	
Out of County	2 (1.25%)	2 (0.94%)	2 (1.01%)	6 (3.03%)	12 (1.53%)	
Total	212	160	212	198	782	



Response to Resistance regarding Gender, Race and Age

This report analyzes the frequency of which force was used against different races of citizens in response to resistance. This analysis includes the largest racial/ethnic groups: white, black and Hispanic, as well as an “other” category.⁵

⁵ Individuals listed as “other” were not taken into custody and race could not be confirmed. All “other” races were documented as males.

In 2024, force was used on a total of 211 persons during 198 response to resistance-related incidents. Of those who were subject to responses to resistance, 174 (82.5%) were male subjects compared to 37 (17.5%) female subjects.

Table 3.0 Application of Force on Males

	White Males	Black Males	Hispanic Males	Other Males	Total
2021	43 (24.3%)	81 (45.8%)	52 (29.4%)	1 (0.6%)	177
2022	27 (19.3%)	56 (40.0%)	50 (35.7%)	7 (5.0%)	140
2023	45 (22.8%)	87 (44.2%)	61 (31.0%)	4 (2.0%)	197
2024	28 (16.1%)	81 (46.6%)	62 (35.6%)	3 (1.7%)	174
4 Year Average	20.78%	44.33%	32.70%	2.18%	688

Table 3.1 Application of Force on Females

	White Females	Black Females	Hispanic Females	Other Females	Total
2021	6 (17.1%)	22 (62.9%)	7 (20.0%)	0 (0.0%)	35
2022	4 (20.0%)	9 (45.0%)	5 (25.0%)	2 (10.0%)	20
2023	9 (33.3%)	13 (48.1%)	4 (14.8%)	1 (3.7%)	27
2024	10 (27.0%)	20 (54.1%)	4 (10.8%)	3 (8.1%)	37
4 Year Average	24.37%	53.78%	16.81%	5.04%	119

Response to Resistance Regarding Juveniles

In 2024, the Orange County Sheriff's Office made 1,149 juvenile arrests. This was a 4.8% decrease from the 1,207 juvenile arrests made in 2023. There were 30 response to resistance incidents involving juveniles during 2024, which equates to approximately 2.61% of all juvenile arrest encounters.

**Table 4.0
Response to Resistance: Adult vs. Juveniles**

Juvenile vs. Adult	2021	2022	2023	2024
Adult (RTR)	189	146	195	181
Juvenile (RTR)	23	14	29	30
% of RTR per Juvenile Arrest	2.67%	1.36%	2.40%	2.61%
Total RTR (Includes adult and Juvenile)	212	160	224	211
% of RTR utilized on a Juvenile	10.85%	8.75%	12.95%	14.22%
Total Juvenile Arrests	861	1,027	1,207	1,149

Application of Force by Type

The Orange County Sheriff's Office Accreditations Unit captures the data on all response to resistance incidents and records a variety of information, to include the type of force used for statistical analysis and interpretation. The types of force recorded are separated into six categories (i.e. firearm discharge, electronic control device (ECD) discharge, baton, chemical agent/oleoresin capicum (OC) discharge, weaponless/physical force, and canine (K9) bite). Force used on an animal (e.g. vicious dog, injured deer) is not included in this statistical analysis. It should also be

noted that in some incidents several types of force were used and subsequently documented.

In summary for 2024, for the 198 response to resistance incidents, 227 types of force were used and documented. This report's analysis on force is separated into two categories: non-deadly force and deadly force.

Use of Non-Deadly Force

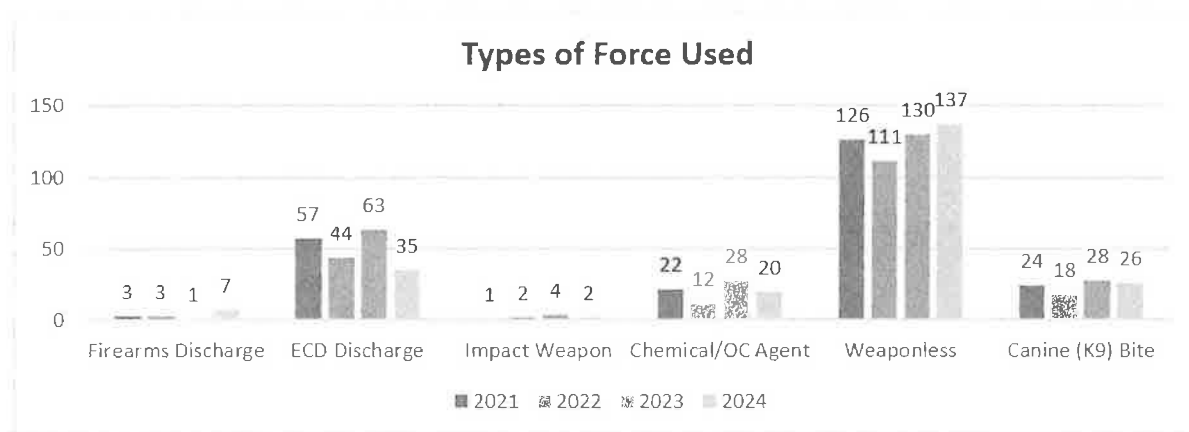
Non-deadly force techniques are expected and predicted to be more frequent since deputies are trained to use force progressively along a proportional continuum. Weaponless force is consistently the most common type of force used in response to resistance each year. Weaponless force, or physical force, is defined as all types of force not listed in another category. It may include, but not be limited to empty hand and control techniques such as takedowns, transporters, pain/mechanical compliance, strikes, and blocks.

In addition to weaponless force options, the Orange County Sheriff's Office provides each deputy with a host of less lethal or intermediate weapons to include: a chemical agent individual protection device (IPD), an expandable baton, and an electronic control device (ECD). Certain select and specifically trained members are provided with less lethal shotguns that utilize a flexible baton munition. The use of these intermediate weapons has remained statistically consistent during the four-year period reviewed.

- Of the force used in a four-year period, deputies used a weaponless option an average of 55.75% of the time resistance was encountered. In 2024, weaponless physical force continued to be the most common type of force response used with 137 reported incidents which is 60.35% of all force used.
- There were 35 ECD deployments in 2024, a 44.4% decrease from 2023. ECD deployments constituted 15.42% of all incidents of force used in 2024, which is consistent with the previous three years.
- In 2024, deputies utilized chemical agent 20 times, a 28.57% decrease from 2023. Chemical agent deployments constituted 8.81% of all force responses, which is consistent with the four-year average percentage of chemical agent use.
- Impact weapons were used 2 times in 2024, a decrease from 4 times in 2023. Impact weapon use constituted 0.88% of all force responses, which is consistent with the four-year average percentage for impact weapons.

Table 5.0 Types of All Force Used

	2021	2022	2023	2024	Total
Firearms Discharge	3 (1.29%)	3 (1.58%)	1 (0.39%)	7 (3.08%)	14 (1.55%)
ECD Discharge	57 (24.46%)	44 (23.16%)	63 (24.80%)	35 (15.42%)	199 (22.01%)
Impact Weapon	1 (0.43%)	2 (1.05%)	4 (1.57%)	2 (0.88%)	9 (1.00%)
Chemical/OC Agent	22 (9.44%)	12 (6.32%)	28 (11.02%)	20 (8.81%)	82 (9.07%)
Weaponless	126 (54.08%)	111 (58.42%)	130 (51.18%)	137 (60.35%)	504 (55.75%)
Canine (K9) Bite	24 (10.30%)	18 (9.47%)	28 (11.02%)	26 (11.45%)	96 (10.62%)
Total	233	190	254	227	904



Non-Fatal Injuries to Subjects and Deputies

Table 6.0
Non-Fatal Injuries to Subjects

	2021	2022	2023	2024	Total
Total RTR Incidents	212	160	212	198	782
Incidents of Non-Fatal Subject Injury	66 (31.13%)	53 (33.13%)	76 (35.85%)	105 (53.03%)	301 (38.49%)

Table 6.1
Non-Fatal Injuries to Deputies

	2021	2022	2023	2024	Total
Total RTR Incidents	212	160	212	198	782
Incidents of Deputy Injury	25 (11.79%)	56 (35.00%)	35 (16.51%)	50 (25.25%)	167 (21.31%)

Deadly Force Overview

Each deadly force incident requires individual analysis and thorough investigation. The Orange County Sheriff's Office provides every sworn deputy with response to resistance training annually, which includes de-escalation strategies. In the annual de-escalation training, techniques such as utilizing time, distance, cover, communication, less lethal weapons, and use of back-up are discussed to prevent the need of lethal force, when possible.

Deputies are reminded to use de-escalation techniques, when practical, when responding to all incidents. This includes critical incidents where the subject is reported to be armed, under the influence of drugs or alcohol, or is mentally or emotionally unstable.

From 2021 to 2024, there were 14 deadly force events involving 33 deputies. In 2024, there were seven (7) deadly force events involving fifteen (15) deputies.

Table 7.0
Four Year Trend of Deadly Force Encounters

	2021	2022	2023	2024	Total
Total	3	3	1	7	14

In-Custody Death

In 2024, eight deputies encountered a white female subject who was secured and later died. The numbers of deputies involved in this encounter and their demographics are not included in the following charts. Per Orange County Sheriff's Office General Order 8.1.0 and In-Custody Death is defined as a death, or the onset of a physiological condition resulting in death, that occurs while a suspect is in law enforcement custody, or while an attempt is being made to take a subject into custody. The death may or may not involve the application of force.

Table 7.1
Characteristics (Race/Gender/Ethnicity) of Deadly Force Encounters

Year	White		Black		Hispanic		Other		Total
	Male	Female	Male	Female	Male	Female	Male	Female	
2021	1	0	2	0	0	0	0	0	3
2022	1	0	1	1	0	0	0	0	3
2023	0	0	0	0	1	0	0	0	1
2024	1	0	5	0	1	0	0	0	7
Total Encounters	3	0	8	1	2	0	0	0	15
Total Fatal	3	0	5	0	1	0	0	0	9
Percent Fatal	100%	0%	62.5%	0%	50%	0%	0%	0%	60%

Table 7.2
Characteristics (Race/Gender/Ethnicity) of Subjects Receiving Fatal Injuries

Year	White		Black		Hispanic		Other		Total
	Male	Female	Male	Female	Male	Female	Male	Female	
2021	1	0	1	0	0	0	0	0	2
2022	1	0	1	0	0	0	0	0	2
2023	0	0	0	0	1	0	0	0	1
2024	1	0	3	0	0	0	0	0	4
Total	3	0	5	0	1	0	0	0	9

The predominant race of deputies involved in shootings during the past four years have been white. Of the 33 deputies who were in deputy involved shootings (DIS) between 2021 and 2024, 17 (51.5%) were white.

In 2024, of the 15 deputies involved in the DIS incidents, eight (53.3%) were white, five (33.3%) were Hispanic, and two (13.3%) were black. The race of the agency's 1,709 sworn deputies in 2024 was, 54.3% white, 14.6% black, 25.8% Hispanic, .05% are listed as "other race".

Of the 33 deputies involved in deadly force events within the last four years, three were female, and 30 (90.9%) were male.

In 2024, of the 15 deputies involved in the deadly force event, thirteen were males and two (9.1%) were female. In 2024, of the 1,709 sworn deputies, 15% were female and 85% were male. Therefore, the gender ratio of the deputies involved in deadly force incidents in 2024 were proportionate with the gender ratio regarding sworn staffing.

Table 7.3
Characteristics (Race/Gender/Ethnicity) of Deputies Involved in Deadly Force

Year	White		Black		Hispanic		Other		Total
	Male	Female	Male	Female	Male	Female	Male	Female	
2021	2	1	0	0	3	0	0	0	6
2022	4	0	2	0	2	0	0	0	8
2023	2	0	0	0	1	0	1	0	4
2024	7	1	2	0	4	1	0	0	15
Total	15	2	4	0	10	1	1	0	33

Table 7.4
Deputy Tenure of Deadly Force Incidents

Year	1-5 Years	6-10 Years	11-19 Years	20+ Years
2021	6	0	0	0
2022	3	4	1	0
2023	2	1	1	0
2024	9	5	1	0
Percentage	60.6%	30.30%	9.1%	0.00%

Table 7.5
Geographical Location of Occurrence of Deadly Force

	2021	2022	2023	2024	Total	% per Sector
Sector 1	1			3	4	29%
Sector 2				1	1	7%
Sector 3	1	1			2	14%
Sector 4	1	2	1	3	7	50%
Sector 5					0	0%
Sector 6					0	0%
Sector 7					0	0%
Out of County					0	0%
Total per Year	3	3	1	7	14	100%

Table 7.6
Agency Employee Demographics

Sworn	Male	Female	Total
White	797	131	928
Black	207	43	250
Hispanic	371	71	442
Other	78	11	89
Total Sworn	1,453	256	1,709
Civilian	Male	Female	Total
White	116	232	348
Black	33	127	160
Hispanic	66	112	178
Other	23	27	50
Total Civilian	238	498	736
Total Employees	Male	Female	Total
White	913	363	1,276
Black	240	170	410
Hispanic	437	183	620
Other	101	38	139
Total Employees	1,691	754	2,445

Application of Force by Day of the Week and Time of Day

In 2024, force was used most often between 1800 and 0000 hours. This timeframe represented 35.68% of all force incidents. For the previous four years, this timeframe was consistently the top representative of force application.

Table 8.0
Response to Resistance Incidents by Time of Day

	2021	2022	2023	2024	Total
0000-0600	35	26	42	46	149
0600-1200	43	33	22	30	128
1200-1800	55	49	71	51	226
1800-0000	79	52	77	71	279
Total	212	160	212	198	782

In 2024, force was used more on Sundays than any other day of the week, with 37 incidents. Monday represented the lowest number of incidents, with 17 being reported.

Table 8.1
Response to Resistance Incidents by Day of the Week

	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Total
2021	24	22	33	30	41	34	28	212
2022	36	17	24	22	22	13	26	160
2023	35	26	29	32	37	29	24	212
2024	37	17	33	23	29	32	27	198
Total	132	82	119	107	129	108	105	782

Training, Equipment and Written Directive Analysis

In 2024, the agency continued its training evolution with an emphasis on providing employees with the most modern, relevant, realistic training available. Agency employees attended numerous advanced, specialized training courses to build their knowledge, to enhance training efforts. Mandatory training for sworn personnel included use of the Virtra simulator, with focus on de-escalation tactics, and response to active assailant incidents. Additionally, the agency commenced ongoing efforts to train and certify sworn employees as Crisis Intervention Team (CIT) members.

The agency's Training Section acquired and implemented the BolaWrap, a non-lethal remote restraint device, and issued a select amount to sworn personnel in 2024. To date, the BolaWrap has not been deployed so statistical information pertaining to it was not included in this year's report.

As with each year, the agency continuously evaluates equipment to offer the finest level of training available.

Conclusion

The Orange County Sheriff's Office Training Section conducted an annual review of all force and weapon related policies during 2024. All employees who are authorized to utilize any force option are required to review the Response to Resistance policy on an annual basis and acknowledge this in PowerDMS.⁶ During the annual defensive tactics training, instructors review the Response to Resistance policies with all applicable personnel. Prior to being issued any firearm or authorized weapon, all newly hired deputies (and applicable employees), will complete the requisite training, to include an acknowledging receipt of the Response to Resistance and Firearms policies.

Based on the statistical data captured in 2024, the Training Section has not identified any areas which lacked training opportunities. The agency continues to train its personnel according to agency and national trends to ensure that the sworn component of our agency is ready to respond to a plethora of situations and perform as they were trained to achieve an effective outcome.

⁶ PowerDMS is a web-based software used for management, distribution, and tracking of agency policy and procedures.

Training Courses Offered in 2024

Virtual Online Training

- Legal Updates
- DriveCAM Coaching Training
- Annual Supervisor Training
- Watch Commander Academy

In Person Training

- Employee Wellness
- De-escalation Scenarios (Incorporated VirTra Simulator)
- Blackhawk T-Series Holster Transition
- Axon Capture Citizen Training
- Body Worn Camera New User
- Weapon Qualifications & Drills
- Close-Quarter Vehicle Combat
- Close-Quarter Combat
- Pistol-Mounted Optics
- Police Rifle
- Police Rifle Refresher
- Advanced Rifle
- Female Combatives
- Introduction To Tactical Combatives
- Tactical Combative I
- Tactical Combatives II
- Back To Basics Pistol
- Concealed Carry Class
- Back to basic Rifle
- Low Light Pistol
- Tactical Handgun
- Tactical Shotgun
- Bola Wrap
- Less Lethal New User
- Advanced Tactics with SWAT
- Defensive Tactics and Response to Resistance
- Tactical Combatives 1 and 2
- Female Officer Survival Course
- Annual Supervisor Training
- Administrative Assistant Academy
- CPR Certification
- Driving Training - Skid Recovery, Stop Sticks and Emergency Driving.
- Pursuit Intervention Technique - User and Instructor Training
- Off Duty Conceal Carry
- Low Light Handgun
- Active Threat Training
- Red Dot Sighting System
- K9 Operations for Patrol



RESISTANCE LEVELS

- 6 Aggravated Physical
5 Aggressive Physical
4 Active Physical
3 Passive Physical
2 Verbal
1 Presence

[illegible]

RESPONSE LEVELS

10-1500 (10/24)