Axon VR

Community Engagement Training (CET)

Interactive Case Law I

FACILITATOR'S GUIDE



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FACILITATOR'S GUIDE OVERVIEW & USAGE TIPS

This Facilitator's Guide is customizable, enabling you to adapt it to your specific needs for tracking trainee progress, preparing for and conducting training sessions, and debriefing and assessing trainees after they complete the CET scenario in-headset.

TRAINING SESSION PREPARATION	
NOTE: Trainers should complete the scenario in-headset at least once prior to facilitating this CET module with trainees.	
LESSON PLAN	Review the lesson plan, which provides a comprehensive overview of the CET module, including its purpose, scenario overview, trainer preparation guidance, references, and links to additional resources.
LEARNING OBJECTIVES	Review the CET module's learning objectives, identify additional learning objective skills to assess trainees on during the scenario, and add any agency-specific learning objective skills to assess.
AGENCY RESOURCES	Add agency-specific notes, including local and state resources, best practices, and pertinent guidelines tailored to your agency and community.
TRAINEE PRE-WORK HANDOUT	Provide the trainee with the pre-work handout, which offers an overview of the CET topic. The trainee should review this handout before completing the scenario in headset.
SCENARIO FLOW & DECISION POINTS	Refer to the one-page flowchart outlining the scenario's decision points and corresponding branches as needed.

TRAINEE EVALUATION	
Use the trainee evaluation form to track trainee completion and document notes on their scenario decisions. Conduct a debriefing with the trainee by asking debriefing questions and questions in the scenario assessment rubric. Print copies for each trainee and add the trainee's name, ID, and position at the top of each evaluation form to use as a training record. **NOTE**: If facilitating this CET with multiple trainees at once, use the group debriefing and group Scenario Assessment Rubric questions in the group evaluation section to debrief the group. Axon also recommends screen casting the in-headset experience for the group to observe.	
DEBRIEFING QUESTIONS	After the trainee completes the scenario in-headset, conduct a debriefing with them to provide feedback, discuss their choices and the scenario's outcome. Use the provided debriefing questions for guidance and incorporate any agency-specific debriefing questions.
SCENARIO ASSESSMENT RUBRIC	Conduct an assessment of the scenario topic with the trainee based on the CET module's learning objectives. Use the provided assessment questions for support as needed. Your assessment should also include a discussion about agency policy and a review of any pertinent local and state resources.

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LESSON PLAN

COURSE OVERVIEW	The Interactive Case Law I CET module is the first 360º training directly tied to a real-world case. In Estate of Armstrong v. Village of Pinehurst et al., the United States Court of Appeals for the 4th Circuit examined the use of a TASER energy weapon on a mentally impaired subject and determined officers used unconstitutional excessive force. However, because the law was not clearly established at the time the force was used, the officers were granted qualified immunity and the case against the individual officers was dismissed. This training module highlights and presents alternative paths from the perspective of the commanding officer and their decisions that precipitated the eventual filing of Armstrong v. Pinehurst. Trainees must make use of force and de-escalation decisions to improve the likelihood of reaching a mutually beneficial outcome for everyone involved. After completing the experience, the trainer will conduct a debriefing with the trainee. The trainee must score 100% on the scenario assessment rubric.
IN-HEADSET VR EXPERIENCE	Trainees will begin the in-headset experience dispatched on a call to a "danger to self" subject requiring public safety intervention. Trainees will be asked to make decisions in real time by selecting from multiple on-screen options. The trainees will see the scenario play out based on their selections. No VR Controllers are required; trainees will use headset movements to aim a crosshair and make selections. See the scenario flow and decision points flowchart for an overview of the VR scenario and decision points branching.
LEARNING OBJECTIVES	Given a scenario depicting a subject refusing to cooperate, the trainee will compare/contrast the officer's actions and decisions to the case law decision in Armstrong v. Village of Pinehurst, 810 F.3d 892 (4th Cir. 2016) with their agency trainer and score 100% on the scenario assessment rubric.
INSTRUCTIONAL GOAL	The goal of this scenario is to view the initial event as a passive observer, then to re-enter the scene as a responding officer, make decisions as the responding officers based on (your) agency's use of force policy, and proceed with the information made available in the scenario.
REQUIRED MATERIALS	Available on the VR training materials page on Axon Help: • Facilitator's Guide (with lesson plan, trainee pre-work handout, and scenario assessment rubric) • Sample course roster (optional for collecting trainee names and email addresses and tracking completion)
PREREQUISITES	None

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EQUIPMENT	• Axon VR headset • Samsung VR tablet *(optional, but recommended for trainer observation through Miracast)*
DATE CET MODULE RELEASED	June 2023

FACILITATOR'S GUIDE UPDATES	**March 2026**: New Facilitator's Guide format and location:
	• Updated from Axon Academy course format to a customizable PDF
	• Includes the following embedded materials:
	  ○ Lesson plan
	  ○ Trainee pre-work handout
	  ○ Scenario assessment rubric
	• Now available for download on the VR training materials page on Axon Help.

COURSE LENGTH	30 minutes (in-person instructor-led training)
COURSE CREDIT HOURS	30 minutes
FACILITY LOCATION	The Training Space will be identified by the agency and must contain a virtual boundary to keep trainees safe. Training Spaces should be kept clear of objects, pets, live weapons, and other people.
TESTING / CERTIFICATION	The trainee must score 100% on the scenario assessment rubric to pass the training. **NOTE**: This curriculum is certified by the International Association of Directors of Law Enforcement Standards & Training (IADLEST) through the National Certification Program (NCP). This certification may be eligible for POST continuing education hours. To adhere to IADLEST certification requirements, trainers must use a tablet or casting device to enhance their trainee assessment capabilities. For an overview of the required steps for fulfilling the IADLEST certified curriculum requirements, see the IADLEST Overview on the VR training materials page on Axon Help.
TARGET GROUP	Public safety and law enforcement officers

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INSTRUCTORS	Any agency-identified VR trainer
GROUP RATIO	This curriculum is designed for a trainer-to-trainee ratio of 1:1. **NOTE**: If facilitating this module with multiple trainees at the same time, Axon recommends screen casting a trainee's in-headset experience for the group to observe. Then use the group debriefing questions and the group scenario assessment rubric to guide your debriefing with the group.
TRAINER PRE-WORK	1. Create a VR Training Space. This is a 360° video experience that is best viewed while seated. 2. Open the CET application and download the module to the Library if it's not already present. 3. Once downloaded, complete the module in-headset at least once prior to facilitating this CET. View the scenario more than once to experience the different possible outcomes.
ADDITIONAL RESOURCES	• For assistance facilitating this CET or setting up Axon VR equipment, see the Virtual reality training page on Axon Help • For assistance screen casting the in-headset experience, see the Screen cast options article
REFERENCE LIST	• Ranalli, M. (2023, January 6). *The Impact of Armstrong v. Pinehurst on Police Policy*. Lexipol. https://www.lexipol.com/resources/blog/policy-or-training-a-delicate-balance-to-guide-officer-behavior/ • LLRMI. (2016). *Armstrong v. Village of Pinehurst – 4th Circuit (2016)*. Legal & Liability Risk Management Institute. https://www.llrmi.com/articles/legal_update/2016_armstrong_v_village_of_pinehurst/ • Graham v. Connor, 490 U.S. 386 (1989) • Armstrong v. Village of Pinehurst, 810 F.3d 892 (4th Cir. 2016)

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ADDITIONAL MATERIALS

Download the following optional materials from the VR training materials page on Axon Help.

SAMPLE COURSE ROSTER	Print the sample course roster to use while facilitating training to collect the names and email addresses of trainees and track completion.
CERTIFICATE OF COMPLETION	Print and provide the trainee with the certificate of completion upon successfully completing the training requirements. Based on agency policy, inform the trainee to provide a copy of the certificate to the training department for possible in-service credit.

SAMPLE COURSE SCHEDULE

0800-0810	Trainee reviews the pre-work handout
0810-0820	Trainee completes VR scenario in-headset
0820-0830	Trainer conducts assessment debriefing with the trainee using the debriefing questions and scenario assessment rubric

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LEARNING OBJECTIVES

Given a scenario depicting a subject refusing to cooperate, the trainee will compare/contrast the officer's actions and decisions to the case law decision in Armstrong v. Village of Pinehurst, 810 F.3d 892 (4th Cir. 2016) with their agency trainer and score 100% on the scenario assessment rubric.

LEARNING OBJECTIVE SKILLS

Select additional learning objective skills to assess trainees on in this module:

SITUATIONAL AWARENESS & OBSERVATION

- ☐ 360º awareness
- ☐ Interview stance
- ☐ Observation: Whole body, hands, beltline, demeanor (immediate area)
- ☐ Subject proximity

TASER ENERGY WEAPON DEPLOYMENT

- ☐ Post deployment activity (Supervisor; Medical; other)
- ☐ Principles of after-care post TASER energy weapon deployment
- ☐ Probe deployment: Clothing consideration

ADMINISTRATIVE TASKS

- ☐ Court preparation
- ☐ Report writing
- ☐ Resource identification

DE-ESCALATION & COMMUNICATION

- ☐ Active listening & conflict resolution
- ☐ Building rapport
- ☐ Communication with partner
- ☐ Communication with subject/individual
- ☐ Cuffing under power
- ☐ Dispatch disparity (caller perception, bias, etc.)
- ☐ Duty to intervene
- ☐ Empathy
- ☐ Family intervention
- ☐ Non-verbal communication
- ☐ Third party considerations/bias
- ☐ Verbal de-escalation

AGENCY-SPECIFIC LEARNING OBJECTIVE SKILLS

Add any additional agency-specific learning objective skills you would like to assess trainees on as a part of this scenario:

☐ ☐

☐ ☐

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AGENCY RESOURCES

This training is best augmented with agency-specific resources. Axon does not make any recommendations on agency policies.

In alignment with agency policy, consider creating a supplemental guide (or use the space below to add agency-specific notes) to share with trainees that includes the local and state resources available that are specific to your agency and community, best practices, and agency-specific guidelines.

AGENCY-SPECIFIC NOTES

TRAINEE EVALUATION (INDIVIDUAL)

After the trainee completes the VR scenario in-headset, conduct a debriefing with them to provide feedback and discuss their choices and the scenario outcome using the provided questions as a guide. Then, complete the Scenario Assessment Rubric with the trainee.

You can use the trainee evaluation form with the debriefing questions and scenario assessment rubric as a training record to record performance notes and track individual trainee evaluations. Simply print copies for each trainee.

NOTE: If facilitating this CET with multiple trainees at once, use the group debriefing and Scenario Assessment Rubric questions in the group evaluation section to conduct a debriefing with the group.

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TRAINEE EVALUATION: INTERACTIVE CASE LAW I

TRAINEE NAME	TRAINEE ID	TYPE
		☐ Recruit ☐ Officer

DEBRIEFING QUESTIONS (INDIVIDUAL)

- ☐ What factors influenced your actions/decisions?
- ☐ What choices seemed the least effective in de-escalating the situation? Which were most effective?
- ☐ What indicators stood out to you that suggested the subject was likely not a threat? (Audible cues, environmental factors, immediate surroundings, body language, etc.)
- ☐ Did any of the consequences of certain choices come as a surprise? If so, which one(s)? Why?
- ☐ Would you change any of your choices after viewing the outcome of the scenario? Which choices would you have made differently?
- ☐ What is our agency's policy in responding to situations similar to this scenario?

AGENCY-SPECIFIC QUESTIONS

- ☐
- ☐
- ☐

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SCENARIO ASSESSMENT RUBRIC (INDIVIDUAL)

Given a scenario depicting a subject refusing to cooperate, the trainee will now compare/contrast the officer's actions and decisions to the case law decision in *Armstrong v. Village of Pinehurst*, 810 F.3d 892 (4th Cir. 2016) with their agency trainer and score 100% on the scenario assessment rubric questions below.

As part of the Assessment Rubric, Axon recommends discussing agency policy and reviewing local and state resources with the trainee.

Q1: In *Armstrong v. Pinehurst*, did Armstrong present a risk of immediate danger? Explain your rationale using the court holding and analysis.	
☐ **Passing Response**	The trainee clearly articulates that Armstrong did not present a risk of immediate danger, and includes one or more of the following in their response: • Armstrong displayed non-violent passive resistance, which is not synonymous with the risk of immediate danger. • Armstrong did not present a threat of immediate danger to himself or others when he sat down and wrapped his arms and legs around the post.
☐ **Failing Response**	The trainee attempts to articulate that Armstrong presented a risk of immediate danger at the time force was used.
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Q2: In *Armstrong v. Pinehurst*, was the officer objectively reasonable in using a TASER energy weapon on Armstrong multiple times? Explain your rationale using the court holding and analysis.	
☐ **Passing Response**	The trainee clearly articulates that use of a TASER energy weapon on a suspect solely engaging in stationary, non-violent resistance is excessive force, and includes one or more of the following in their response: • At the time of energy weapon deployment, Armstrong did not present an immediate risk of harm to himself or others. • There was no urgency to remove Armstrong from the pole and get him in custody. • Because the officers had time, they should have attempted other tactics in an attempt to de-escalate the situation.
☐ **Failing Response**	The trainee attempts to articulate that the officer's use of the TASER energy weapon multiple times was objectively reasonable under the circumstances.
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Q3: If a subject's mental health is known, should officers account for it when deciding when and how to use force? Explain your rationale using the court holding and analysis.	
☐ **Passing Response**	The trainee clearly articulates that a subject's mental health, if known, is a fact that officers must account for when deciding when and how to use force, and includes one or more of the following in their response: • Officers should consider all known circumstances when making use of force decisions, one of which is the subject's mental health. • A subject's mental health can weigh for or against the use of force.
☐ **Failing Response**	The trainee attempts to articulate why a subject's mental health, when known, should not be considered by officers when deciding when and how to use force.

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Q4: Under *Armstrong v. Pinehurst*, can the use of a TASER energy weapon be justified to protect officers or third parties, or to overcome active resistance or prevent an arrestee's escape? Explain your rationale using the court holding and analysis.	
☐ **Passing Response**	The trainee clearly articulates that a TASER energy weapon use is justified where the officer reasonably believes, under the totality of the circumstances, that the subject presents an immediate threat of harm to the officer(s) or others, or to overcome resistance or prevent an arrestee's escape. One or more of the following should be included in the response: • The officer's belief must be reasonable under the totality of the circumstances • Use of force may be justified when confronted with a level of resistance that presents an immediate threat of harm • Use of force may be justified to overcome the subject's active resistance or attempted flight
☐ **Failing Response**	The student attempts to articulate that an officer is never justified in using a TASER energy weapon when confronted with a resisting or fleeing subject.
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TRAINEE EVALUATION (GROUP)

If facilitating this CET with multiple trainees at once, use these group questions to conduct a debriefing with the group. Add additional questions as needed.

DEBRIEFING QUESTIONS (GROUP)

- [ ] Was [insert trainee name] within policy with their actions/selections? If not, why?
- [ ] Was [insert trainee name] able to successfully justify their actions and articulate their use of force?

AGENCY-SPECIFIC QUESTIONS

- [ ]
- [ ]

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SCENARIO ASSESSMENT RUBRIC (GROUP)

- [ ] Based on the court's analysis in *Armstrong v. Pinehurst*, did Armstrong present an immediate danger to himself or others at the time of the TASER deployment? Explain your reasoning.

- [ ] In the context of *Armstrong v. Pinehurst,* was the officer's use of a TASER energy weapon on Armstrong multiple times objectively reasonable?

- [ ] According to the holding in *Armstrong v. Pinehurst*, under what conditions is the use of a TASER energy weapon justified?

AGENCY-SPECIFIC QUESTIONS

- [ ]

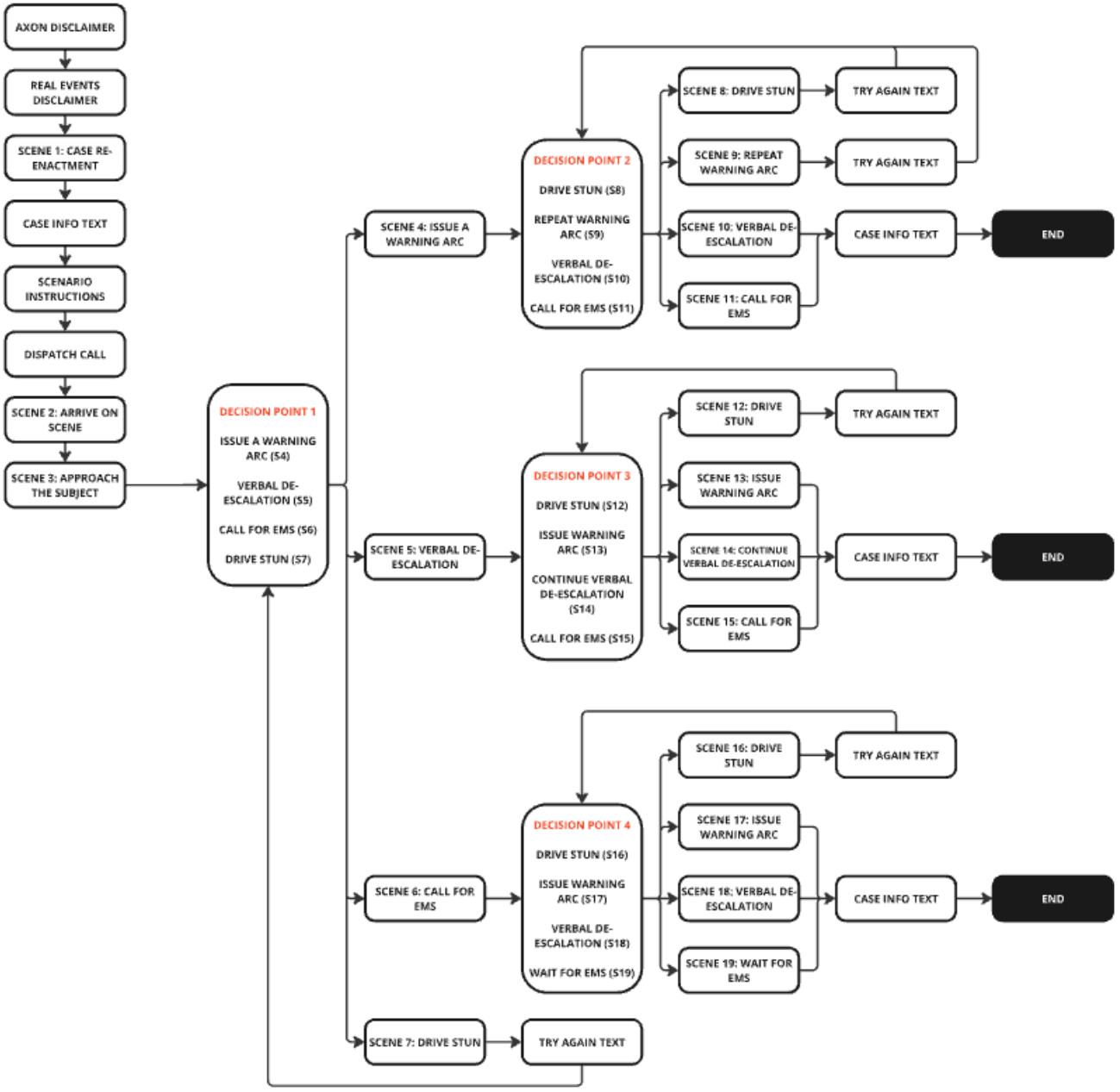
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SCENARIO FLOW & DECISION POINTS

The flowchart below displays the trainee decision points and their respective branches in the scenario.



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TRAINEE PRE-WORK HANDOUT: INTERACTIVE CASE LAW I

Purpose: The purpose of this handout is to provide trainees with an overview of the *Pinehurst v. Armstrong* case information and court holding prior to completing the in-headset VR Interactive Case Law I scenario and trainer debriefing.

CASE OVERVIEW

- Armstrong, who suffered from bipolar disorder and paranoid schizophrenia, had been off his medicine for five days.
- Armstrong's sister convinced him to go to the hospital, but he became frightened and eloped.
- The Pinehurst Police were called to respond.
- Armstrong was friendly at first but then began wandering across the roadway and engaging in self-harm.
- Officers approached Armstrong to subdue him, but he sat down and wrapped his arms and legs around a four-by-four post (he's 5'11" and 262 lbs.), refusing to budge.
- Radio dispatch advised that a court signed a commitment order.
- After 30 seconds of non-compliance, an officer deployed his TASER energy weapon.
    - Drive stun mode–5 times in 2 minutes to no effect.
- Other officers jump in and physically remove Armstrong from the post.
- Armstrong laid face down on the ground and complained that he was being "choked".
- Cuffed–continued to struggle and kick at officers–prompted the use of leg restraints.
- After the struggle ends, Armstrong goes non-responsive and later dies.
- While struggling with Armstrong to place him in handcuffs, Armstrong complained he was being choked.
- After subduing Armstrong, Armstrong's sister noticed that he was facedown and unresponsive. His skin was blue, and he did not appear to be breathing.
- The officers administered CPR, called EMS, and the hospital pronounced him dead shortly after his admission.

CASE OVERVIEW FOURTH CIRCUIT HOLDING & ANALYSIS

Use of a TASER energy weapon on a suspect solely engaging in stationary, non-violent resistance is excessive force. This is now "clearly established law" in the 4th Circuit.

- There are no bright-line rules to apply to uses of force because even slight changes of fact can alter very close judgment calls.
- Non-violent physical resistance is not synonymous with the risk of immediate danger.
- TASER energy weapon use is still appropriate to protect officers, bystanders or prevent arrestee's escape (must be immediate threat).
- A subject's mental health, if known, is a fact that officers must account for when deciding when and how to use force, which can weigh for or against the use of force.
- If you have time, TAKE IT!
    - There was no urgency to get Armstrong into custody given that he was not presenting a threat to himself or others.
- Document, document, document!
    - Articulate all reasons for using force at the time, listing out all relevant factors.

References:

- LLRMI. (2016). *Armstrong v. Village of Pinehurst – 4th Circuit (2016).* Legal & Liability Risk Management Institute. https://www.llrmi.com/articles/legal_update/2016_armstrong_v_village_of_pinehurst/
- Lexipol. (2020, September 18). *Policy or training? A delicate balance to guide officer behavior.* Lexipol. https://www.lexipol.com/resources/blog/policy-or-training-a-delicate-balance-to-guide-officer-behavior/