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"Send Freedom House!": A Study in Police Abolition

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“SEND FREEDOM HOUSE!”: A STUDY IN POLICE ABOLITION

Tiffany Yang*

Abstract: Sparked by the police killings of George Floyd and Breonna Taylor, the 2020 uprisings accelerated a momentum of abolitionist organizing that demands the defunding and dismantling of policing infrastructures. Although a growing body of legal scholarship recognizes abolitionist frameworks when examining conventional proposals for reform, critics mistakenly continue to disregard police abolition as an unrealistic solution. This Essay helps dispel this myth of “impracticality” and illustrates the pragmatism of abolition by identifying a community-driven effort that achieved a meaningful reduction in policing we now take for granted. I detail the history of the Freedom House Ambulance Service, a Black civilian paramedic service in Pittsburgh, Pennsylvania, that was created in the late 1960s to confront the racialized violence and neglect inflicted by police ambulance drivers. This Essay outlines the now abolished practice of ambulance policing, explores the city’s response to Freedom House’s revolutionary program, and analyzes current efforts of police reform through this historical lens.

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INTRODUCTION

In 2011, Willie Ray Banks pleaded “I can’t breathe” after the police

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repeatedly tasered him and pinned his body to the ground.¹ One police officer responded, “If you’re talking, you’re breathing—I don’t want to hear it.”² Another officer denied that Banks was dying and offered to “give a damn trophy out if he does.”³ Banks became unresponsive before the police delivered him to the jail in Burnet County, Texas, and he was soon thereafter pronounced dead.⁴

Willie Ray Banks’s death was not the first instance, nor the last, of the police killing a person who cried out for help.⁵ In 2014, Eric Garner pleaded “I can’t breathe” at least eleven times while the police choked him on a New York sidewalk.⁶ Just a few months later, Balantine Mbegbu pleaded “I can’t breathe, I’m dying” when the police hit him in the face, tasered him, and pushed their knees on his back and neck after he asked the officers to leave his Phoenix home.⁷ One month later, the police slammed Tanisha Anderson to the pavement in Cleveland while she was experiencing a mental health crisis, kneeled on her back while pushing her face to the ground, and delayed calling for an ambulance even when she laid unmoving in the middle of the road.⁸ In 2017, Hector Arreola pleaded “I can’t breathe” at least thirteen times in Columbus, Georgia, when the police “flatten[ed]” him, sat on his back, and shackled him to await a psychological evaluation he did not request.⁹ In 2019, Byron Lee Williams pleaded “I can’t breathe” after the police chased him and

1. Eric Dexheimer, *A 3-Minute Taser Jolt, a Quick Settlement: Was Justice Served in Burnet Man’s Death?*, STATESMAN (Nov. 19, 2018, 10:30 AM), <https://www.statesman.com/news/20170522/3-minute-taser-jolt-quick-settlement-was-justice-served-in-burnet-mans-death> [https://perma.cc/895Z-MP7H].

2. Mike Baker, Jennifer Valentino-DeVries, Manny Fernandez & Michael LaForgia, *Three Words. 70 Cases. The Tragic History of ‘I Can’t Breathe.’*, N.Y. TIMES (June 29, 2020), <https://www.nytimes.com/interactive/2020/06/28/us/i-cant-breathe-police-arrest.html> (last visited Aug. 9, 2021); see Dexheimer, *supra* note 1.

3. Dexheimer, *supra* note 1.

4. *Id.*

5. The following examples in this paragraph rely on the reporting of video footage filmed by witnesses (such as in the killings of Eric Garner and George Floyd), or on the reporting of facts asserted by witnesses in interviews or civil lawsuits (such as in the killings of Balantine Mbegbu, Tanisha Anderson, Hector Arreola, Byron Lee Williams, and Angelo Quinto).

6. Christopher Mathias, *Eric Garner Said ‘I Can’t Breathe’ 11 Times—Now Activists Are Making 11 Demands in His Name*, HUFFPOST (Dec. 12, 2014), https://www.huffpost.com/entry/eric-garner-protests-demands_n_6308956 [https://perma.cc/MJF7-NWEV].

7. *Mbegbu v. City of Phoenix*, No. CV-16-00424-PHX-DGC, 2017 WL 4679260, at *1–3 (D. Ariz. Oct. 18, 2017); see Baker et al., *supra* note 2.

8. Michelle Dean, *‘Black Women Unnamed’: How Tanisha Anderson’s Bad Day Turned into Her Last*, GUARDIAN (June 5, 2015, 11:49 AM), <https://www.theguardian.com/us-news/2015/jun/05/black-women-police-killing-tanisha-anderson> [https://perma.cc/RVA3-4WQM].

9. Plaintiffs’ Statement of Material Facts at 5–20, *Arreola v. Consol. Gov’t of Columbus*, No. 4:19-cv-00005-CDL (M.D. Ga. Dec. 13, 2019); see also Baker et al., *supra* note 2.

kneeled on his back for allegedly riding a bicycle without a safety light in Las Vegas.¹⁰ In 2020, George Floyd pleaded “I can’t breathe” more than twenty times while the police held a knee to his neck.¹¹ And in 2021, Angelo Quinto asked the police not to kill him before they knelt on his back and neck for nearly five minutes.¹² These people are a few among many who were killed by the police after begging for their lives.¹³

When the police killed Eric Garner, chokeholds had been banned by the NYPD for over twenty years.¹⁴ By the time the police killed George Floyd, the police killings of Michael Brown, Eric Garner, Tamir Rice, Freddie Gray, and many more¹⁵ had already sparked nationwide protests and promises of widespread reforms.¹⁶ Six years passed between Eric

10. Anita Hassan, *When Byron Williams Died Saying ‘I Can’t Breathe,’ Few Protested. Now His Family Is Fighting for Justice*, NBC NEWS (June 18, 2020, 4:33 AM), <https://www.nbcnews.com/news/us-news/when-byron-williams-died-saying-i-can-t-breathe-few-n1231342> [<https://perma.cc/LU5S-2HU2>]; see also Baker et al., *supra* note 2.

11. Maanvi Singh, *George Floyd Told Officers ‘I Can’t Breathe’ More than 20 Times, Transcripts Show*, GUARDIAN (July 9, 2020, 12:34 PM), <https://www.theguardian.com/us-news/2020/jul/08/george-floyd-police-killing-transcript-i-cant-breathe> [<https://perma.cc/EMY2-46A6>].

12. Jacey Fortin, *California Man Died After Police Knelt on Him for 5 Minutes, Family Says*, N.Y. TIMES (Feb. 25, 2021), <https://www.nytimes.com/2021/02/25/us/angelo-quinto-death-police-kneel.html> [<https://perma.cc/ST5Z-KGZV>].

13. The *New York Times* has reported that between 2010 and 2020, there were at least seventy documented incidents of people dying at the hands of the police after saying the same words: “I can’t breathe.” Baker et al., *supra* note 2.

14. Conor Friedersdorf, *Eric Garner and the NYPD’s History of Deadly Chokeholds*, ATLANTIC (Dec. 4, 2014), <https://www.theatlantic.com/national/archive/2014/12/context-for-the-punishment-free-killing-of-eric-garner/383413/> [<https://perma.cc/3WVM-NMUG>].

15. It is important to note that “[t]he lack of meaningful accountability for the deaths of unarmed Black men also extend[s] to deaths of unarmed Black women and girls.” KIMBERLÉ WILLIAMS CRENSHAW & ANDREA J. RITCHIE, AFRICAN AM. POL’Y F. & CTR. FOR INTERSECTIONALITY AND SOC. POL’Y STUD., SAY HER NAME: RESISTING POLICE BRUTALITY AGAINST BLACK WOMEN 1 (2015). The same year that the police killed Michael Brown and Eric Garner, the police also killed a number of Black women including Tanisha Anderson, Gabriella Nevarez, Aura Rosser, and Michelle Cusseau. *Id.* Although the police killings of Black women have not spurred the same levels of mass protest nor gained the same level of media attention as the police killings of Black men, Black women also face the lethal risk of police violence. *Id.* at 1–2. This erasure and marginalization has catalyzed the Say Her Name campaign, which “sheds light on Black women’s experiences of police violence in an effort to support a gender-inclusive approach to racial justice that centers all Black lives equally.” *Id.* at 1; see also Marcia Chatelain & Kaavya Asoka, *Women and Black Lives Matter: An Interview with Marcia Chatelain*, DISSENT (2015), <https://www.dissentmagazine.org/article/women-black-lives-matter-interview-marcia-chatelain> [<https://perma.cc/YZ68-EDCD>] (highlighting Professor Marcia Chatelain’s agreement with Dani McClain, Melinda Anderson, Kali Gross, and Kimberlé Crenshaw that the conversation about police violence must, but often does not, address the targeting and endangerment of Black women).

16. See, e.g., Shaila Dewan & Mike Baker, *Rage and Promises Followed Ferguson, but Little Changed*, N.Y. TIMES (June 24, 2020), <https://www.nytimes.com/2020/06/13/us/unrest-ferguson-police-reform.html> [<https://perma.cc/ZHK5-RAQ2>] (discussing the broad range of proposed—but largely ineffective—reforms that resulted after the killing of Michael Brown sparked nationwide

Garner's and George Floyd's last breaths, but their killings tragically shared the same core: even where the alleged reason for arrest was rooted in the person's poverty,¹⁷ even where purported reforms should have safeguarded against harm, even where the person begged for their life and beseeched the police to save them, the police chose force over care.

This choice echoes across the history and institution of policing.¹⁸ Pointing to the failure of traditional reforms to abate the brutality of policing, organizers have turned to abolitionist frameworks to guide their communities' demands for transformative change.¹⁹ Calls for police abolition grew in fervor after the 2014 police killings of Black²⁰ community members inspired mass uprisings,²¹ and they surged when the

protests); Mitch Smith, *Policing: What Changed (and Didn't) Since Michael Brown Died*, N.Y. TIMES (Aug. 7, 2019), <https://www.nytimes.com/2019/08/07/us/racism-ferguson.html> [<https://perma.cc/7U6G-NHL3>] (discussing the state of policing after uprisings demanded change following the deaths of Michael Brown and Freddie Gray); Jay Caspian Kang, *'Our Demand Is Simple: Stop Killing Us'*, N.Y. TIMES (May 4, 2015), <https://www.nytimes.com/2015/05/10/magazine/our-demand-is-simple-stop-killing-us.html> [<https://perma.cc/FFS8-B43A>] (discussing the widespread uprisings and community demands organized in the wake of police killings of Freddie Gray, Michael Brown, Eric Garner, Tamir Rice, Tony Robinson, and Walter Scott); Gene Demby, *The Birth of a New Civil Rights Movement*, POLITICO (Dec. 31, 2014), <https://www.politico.com/magazine/story/2014/12/ferguson-new-civil-rights-movement-113906> [<https://perma.cc/7J47-SCQA>] (discussing the "new social justice movement" organized as a response to the killings of Michael Brown, Trayvon Martin, and Eric Garner, among others).

17. The police accused Eric Garner of selling untaxed cigarettes, Mathias, *supra* note 6, and the police accused George Floyd of using a counterfeit twenty-dollar bill, Nicholas Bogel-Burroughs & Will Wright, *Little Has Been Said About the \$20 Bill that Brought Officers to the Scene*, N.Y. TIMES (Apr. 19, 2021, 1:25 PM), <https://www.nytimes.com/2021/04/19/us/george-floyd-bill-counterfeit.html> [<https://perma.cc/8DWX-AV2R>].

18. *See infra* Part I.

19. *Id.*

20. In this Essay, I capitalize "Black" to acknowledge a racial, ethnic, and cultural identity. Many scholars and journalists follow this practice. *See, e.g.*, Kimberlé Williams Crenshaw, *Race, Reform, and Retrenchment: Transformation and Legitimation in Antidiscrimination Law*, 101 HARV. L. REV. 1331, 1332 n.2 (1988) ("When using 'Black,' I shall use an upper-case 'B' to reflect my view that Blacks, like Asians, Latinos, and other 'minorities,' constitute a specific cultural group and, as such, require denotation as a proper noun.") (emphasis in original); Nancy Coleman, *Why We're Capitalizing Black*, N.Y. TIMES (July 5, 2020), <https://www.nytimes.com/2020/07/05/insider/capitalized-black.html> [<https://perma.cc/SH6Z-7ZJ2>] (capitalizing Black to describe a race and cultural group); Mike Laws, *Why We Capitalize 'Black' (and Not 'White')*, COLUM. JOURNALISM REV. (June 16, 2020), <https://www.cjr.org/analysis/capital-b-black-styleguide.php> [<https://perma.cc/4RHS-92RZ>] (observing that capitalizing "Black" recognizes an ethnic identity and is a more inclusive and transnational description than "African American," which excludes Caribbean and Central or South American community members who may also identify as Black). Due to the historical affiliation of white supremacy with the capitalization of "white," I refer to this term in the lowercase. *See Explaining AP Style on Black and White*, ASSOCIATED PRESS (July 20, 2020), <https://apnews.com/article/9105661462> (last visited Aug. 8, 2021).

21. For example, abolition of the prison industrial complex, including policing infrastructures, became a demand following the Ferguson uprising after the killing of Michael Brown. *See, e.g.*,

2020 police killings of George Floyd, Breonna Taylor, Tony McDade, and Rayshard Brooks sparked a renewed reckoning.²²

In the wake of the growing power of abolitionist organizing, more legal scholars are analyzing abolitionist frameworks in their critiques of traditional reforms.²³ However, many voices continue to disregard police abolition as an unrealistic demand. Critics have dismissed abolition as “naïve,”²⁴ nothing more than a “snappy slogan” incapable of soliciting broad support,²⁵ or a “pie-in-the-sky imagining[.]”²⁶ unrooted in reality. Such criticisms reveal a misunderstanding of a demand thoughtfully crafted by the people most directly impacted by state violence, and ignore a rich history of successful abolitionist organizing that demonstrates the practical necessity and viability of this demand.

Ferguson Action, *Our Vision for a New America*, NEIGHBORHOOD FUNDERS GRP. (Nov. 1, 2014), <https://www.nfg.org/resources/ferguson-action-demands> [<https://perma.cc/CB82-RKZ6>] (demanding full employment, decent housing, quality education, an end to the school-to-prison pipeline, an end to police brutality, freedom from mass incarceration, and an end to the prison industrial complex). Of course, demands for police abolition did not begin in 2014. See, e.g., Ruairí Arrieta-Kenna, *The Deep Roots—and New Offshoots—of ‘Abolish the Police’*, POLITICO (June 12, 2020, 7:30 PM), <https://www.politico.com/news/magazine/2020/06/12/abolish-defund-police-explainer-316185> [<https://perma.cc/JL8B-TCEV>] (observing how calls to abolish the police have deep historical roots to the abolition of slavery, W.E.B. Du Bois’s vision of “abolition-democracy,” and the movement of prison abolition).

22. See, e.g., Madison Pauly, *What a World Without Cops Would Look Like*, MOTHER JONES (June 2, 2020), <https://www.motherjones.com/crime-justice/2020/06/police-abolition-george-floyd/> (last visited Aug. 8, 2021) (discussing the increased calls for abolition following the police killing of George Floyd); Mariame Kaba & Andrea J. Ritchie, *We Want More Justice for Breonna Taylor than the System that Killed Her Can Deliver*, ESSENCE (July 16, 2020), <https://www.essence.com/feature/breonna-taylor-justice-abolition/> [<https://perma.cc/7TKS-G9AN>] (explaining the motivations for abolitionist demands in the wake of police killings of Breonna Taylor, George Floyd, Tony McDade, Rimmie Fells, Breonna Hill, Rayshard Brooks, Elijah McClain, Brayla Stone, and many more).

23. A non-exhaustive list of recent examples includes: Angélica Cházaro, *The End of Deportation*, 67 UCLA L. REV. (forthcoming 2021); Amna A. Akbar, *An Abolitionist Horizon for (Police) Reform*, 108 CALIF. L. REV. 1781 (2020); Shirin Sinnar & Beth A. Colgan, *Revisiting Hate Crimes Enhancements in the Shadow of Mass Incarceration*, 95 N.Y.U. L. REV. ONLINE 149 (2020); Allegra M. McLeod, *Envisioning Abolition Democracy*, 132 HARV. L. REV. 1613 (2019); Introduction, *Developments in the Law—Prison Abolition*, 132 HARV. L. REV. 1568 (2019); V. Noah Gimmel & Craig Muhammad, *Are Police Obsolete? Breaking Cycles of Violence Through Abolition Democracy*, 40 CARDOZO L. REV. 1453 (2019); Dorothy E. Roberts, *Democratizing Criminal Law as an Abolitionist Project*, 111 NW. U. L. REV. 1597 (2017); César Cuauhtémoc García Hernández, *Abolishing Immigration Prisons*, 97 B.U. L. REV. 245 (2017); Jocelyn Simonson, *Democratizing Criminal Justice Through Contestation and Resistance*, 111 NW. U. L. REV. 1609 (2017).

24. Stephen Crawford, *The Calls to Abolish the Police*, N.Y. TIMES (June 15, 2020), <https://www.nytimes.com/2020/06/15/opinion/letters/police-race-unrest.html> [<https://perma.cc/WLS8-XQE4>].

25. Glenn Thrush, *Democrats Should Ditch ‘Defund the Police’ and Give Ocasio-Cortez a Bigger Platform*, *Obama Says.*, N.Y. TIMES (Dec. 2, 2020), <https://www.nytimes.com/2020/12/02/us/democrats-should-ditch-defund-the-police-and-give-ocasio-cortez-a-bigger-platform-obama-says.html> [<https://perma.cc/95Y6-BPCX>] (quoting President Barack Obama).

26. Roger Lancaster, *How to End Mass Incarceration*, JACOBIN (Aug. 18, 2017), <https://www.jacobinmag.com/2017/08/mass-incarceration-prison-abolition-policing> [<https://perma.cc/E97N-LQ9X>].

This Essay highlights one historical example that reduced the scale of policing in a meaningful way. In the not too distant past, the police functioned as ambulance drivers (what I call “ambulance policing”) in regions across the country.²⁷ Pittsburgh, Pennsylvania was one such city.²⁸ The racialized violence and neglect that accompanied policing in Pittsburgh manifested into a Black public health crisis, and sustained investments in ambulance policing failed to remedy its well-established harms.²⁹ Driven by a need to secure the safety and health of their neighborhoods, Black Pittsburghers catalyzed the creation of a new civilian ambulance program, Freedom House Ambulance Service,³⁰ that largely existed outside of policing infrastructures.³¹ For the years during which it was allowed to operate, it was a triumph.³² Despite fierce resistance from the police and the program’s premature end, the success of Freedom House would go on to transform the practice of emergency medical care and precipitate the end of ambulance policing.³³

27. See *infra* Part II.A.

28. *Id.*

29. See *infra* Parts II.B and II.D.

30. The history of Freedom House shared in this Essay relies primarily on the author’s review of archived local newspapers from and about this era. But this Essay is not the first to document aspects of this history. See, e.g., Matthew L. Edwards, *Pittsburgh’s Freedom House Ambulance Service: The Origins of Emergency Medical Services and the Politics of Race and Health*, 74 J. HIST. MED. & ALLIED SCIS. 440 (2019) (the history of Freedom House as well as the challenges it faced through the lens of two of its medical leaders, Dr. Peter Safar and Dr. Nancy Caroline); NEMSMA & EMS1, *How Pittsburgh’s ‘Freedom House’ Shaped Modern EMS Systems*, EMS1 (Jan. 29, 2019), <https://www.ems1.com/ems-education/articles/how-pittsburghs-freedom-house-shaped-modern-ems-systems-luEDCMzLZL8XfbzU/> [https://perma.cc/F435-PV5C] (brief history and origins of Freedom House); Valerie Amato, *The Forgotten Legacy of Freedom House*, EMSWORLD (Apr. 29, 2019), <https://www.emsworld.com/article/1222574/forgotten-legacy-freedom-house> [https://perma.cc/ATP2-GNQC] (brief history of individuals involved in Freedom House’s founding); Kevin Hazzard, *The First Responders*, ATAVIST MAG., June 2019 <https://magazine.atavist.com/the-first-responders-paramedics-pittsburgh-civil-rights-ems> [https://perma.cc/JC8V-RA2K] (history of Freedom House focusing on first-person narratives of former paramedic John Moon, co-founder Dr. Peter Safar, and medical director Nancy Caroline, among others); *Episode 405: Freedom House Ambulance Service*, 99% INVISIBLE (July 7, 2020), <https://99percentinvisible.org/episode/freedom-house-ambulance-service/transcript/> [https://perma.cc/5FRM-JBZ3] (compiled interviews of John Moon, reporter Kevin Hazzard, EMS Museum President Richard Clinchy, and retired Falk Foundation president Phil Hallen). This Essay contributes a unique perspective to these existing narratives by providing an analysis of Freedom House’s ambulance service as an abolitionist proposal, situating Freedom House’s history in the context of the racialized violence and neglect inflicted by policing in Pittsburgh, focusing on the efforts of Hill residents and paramedics rather than on the doctors more often recognized for this civilian program, and applying the lessons derived from Freedom House’s history (especially the city’s decision to defund Freedom House and reinvest in ambulance policing) to current conversations surrounding police abolition and proposals for reform.

31. See *infra* Part II.C.

32. *Id.*

33. See *infra* Parts II.C and II.D. It is important to note that despite eventually achieving this

Today, it would be unfathomable to replace existing civilian paramedic services and ambulances with police officers and paddy wagons. After all, the institution of policing has manifested a refusal to care for victims even when they beg for something as basic as air. But just a few decades ago, when confronted with the harms inherent in ambulance policing, advocates of traditional reforms insisted that improved ambulance policing was possible—that additional training and resources would remedy the injustices.³⁴ Now, with the advent of modern civilian ambulances, we can acknowledge the futility and danger of reinvesting in police ambulance drivers. Ending ambulance policing was the only pragmatic solution.

Through the history of Freedom House, this Essay illustrates the viability and practical necessity of abolition. Part I provides a brief introduction to police abolition and the demonstrated need for transformative change. Part II outlines ambulance policing in Pittsburgh and the Black public health crisis it created, details the history and success of Freedom House, and explores the city’s destructive response to this revolutionary program. Part III then applies the abolitionist framework introduced in Part I and the history of Freedom House chronicled in Part II to analyze current efforts of police reform.

I. THE TRANSFORMATION OF ABOLITION

Before turning to the history of Freedom House, this Essay begins with an overview of the brutality of policing. In so doing, it outlines the need for transformative change and provides a brief introduction to police abolition, which seeks to meaningfully address the harm of policing (and the broader prison industrial complex) at its root.³⁵

meaningful but incremental change, the end of police ambulance drivers has not eliminated police presence in hospitals or other spaces of emergency medical care, nor has it eliminated the assignment of police as first responders to 911 calls. *See infra* Part III.

34. *See infra* Part II.D.

35. This Part provides a brief overview of my understanding of (police) abolition to lay a foundation for the analysis shared in Part III and is not intended to be an exhaustive summary. It is my hope that this Essay provokes further study and consideration of abolition, and that it adequately honors the many brilliant organizers and scholars who have nourished this longstanding movement towards an abolitionist horizon. For a more detailed and robust understanding of abolition, follow the work of abolitionist community groups and organizations such as Critical Resistance, INCITE! Women, Gender Non-Conforming, and Trans People of Color Against Violence, Survived & Punished, Black Youth Project 100 (BYP100), Dream Defenders, Assata’s Daughters, Mijente, Detention Watch Network, Project NIA, Black and Pink, Puente Human Rights Movement, and Southerners on New Ground (among many others). Also look to the work of abolitionist organizers and scholars such as Angela Davis, Ruth Wilson Gilmore, Dylan Rodriguez, Rachel Herzog, Mariame Kaba, Beth E. Richie, Dean Spade, Andrea Ritchie, and Joey Mogul (among many others).

The institution of policing has demonstrated a propensity for chronic racialized violence. Only a tiny percentage of today's policing work addresses so-called "violent" crime—one study found the share to be as small as four percent³⁶—and yet the violence of everyday policing is overwhelmingly and tragically routine.³⁷ As established by a growing consensus of medical professionals, police brutality is itself a "public health emergency" requiring prompt attention.³⁸

When discussing police violence, much attention is justifiably focused on police shootings³⁹—but the police can inflict a broad scope of pervasive harms.⁴⁰ For example, injuries inflicted by the police can be almost as ubiquitous in emergency rooms as injuries from motor accidents.⁴¹ The evidence of racial discrimination in everyday police stops

Much of the legal scholarship identified in note 23 also include insightful definitions, frameworks, and analyses of abolition, especially the works of Professors Amna A. Akbar, Allegra M. McLeod, and Dorothy E. Roberts. *See supra*, note 23. Abolitionist organizer and educator Micah Herskind has also compiled a helpful resource guide for those wanting to learn more about abolition. Micah Herskind, *Resource Guide: Prisons, Policing, and Punishment*, MEDIUM (July 14, 2019), <https://micaherskind.medium.com/resource-guide-prisons-policing-and-punishment-efb5e0f6620> (last visited Aug. 4, 2021).

36. Jeff Asher & Ben Horwitz, *How Do the Police Actually Spend Their Time?*, N.Y. TIMES (June 19, 2020), <https://www.nytimes.com/2020/06/19/upshot/unrest-police-time-violent-crime.html> [<https://perma.cc/JY8M-RQKU>] (describing a study of open data portals that indicate that officers in some cities have spent approximately four percent of their time "responding to . . . serious violent [offenses]").

37. *See discussion infra* Parts I, II.B–D, III.A.

38. *Police Violence Is a Public Health Emergency*, PHYSICIANS FOR NAT'L HEALTH PROGRAM (June 2, 2020), <https://pnhp.org/police-violence-is-a-public-health-emergency/> [<https://perma.cc/8Z4D-BLK2>]; *Addressing Law Enforcement Violence as a Public Health Issue*, AM. PUB. HEALTH ASS'N, (Nov. 13, 2018), <https://www.apha.org/policies-and-advocacy/public-health-policy-statements/policy-database/2019/01/29/law-enforcement-violence> [<https://perma.cc/R9RA-L9FK>]; Len Strazewski, *Why Police Brutality Is a Matter of Public Health*, AM. MED. ASS'N (June 8, 2020), <https://www.ama-assn.org/delivering-care/health-equity/why-police-brutality-matter-public-health> [<https://perma.cc/93L9-QNCP>].

39. In 2020 alone, there were over 1,000 documented instances of fatal police shootings. *Fatal Force: 949 People Have Been Shot and Killed by Police in the Past Year*, WASH. POST (July 16, 2021), <https://www.washingtonpost.com/graphics/investigations/police-shootings-database/> [<https://perma.cc/37AQ-SEVV>].

40. This Part summarizes some of the varied harms inflicted by modern-day policing to provide context for abolitionist demands for police abolition. For a comprehensive summary of structural critiques of policing that has emerged in legal scholarship, see Akbar, *supra* note 23, at 1789–1800.

41. Jill Lepore, *The Invention of the Police*, NEW YORKER (July 13, 2020), <https://www.newyorker.com/magazine/2020/07/20/the-invention-of-the-police> [<https://perma.cc/EKf6-UCSW>] (citing a study "suggest[ing] that, among American men between the ages of fifteen and thirty-four, the number who were treated in emergency rooms as a result of injuries inflicted by police and security guards was almost as great as the number who, as pedestrians, were injured by motor vehicles.").

has been deemed “unequivocal,”⁴² and policing agencies have exerted this form of racialized violence to generate revenue for municipalities and local governments.⁴³ Studies have demonstrated that police officers commit sexual abuse or harassment,⁴⁴ as well as domestic violence and intimate partner abuse,⁴⁵ with alarming frequency. The police routinely use chemical weapons that are instruments of war,⁴⁶ and they employ so-called “non-lethal” weapons, such as kinetic impact projectiles (including “rubber bullets”) or tear-gas and flash-bang stun grenades, in lethal ways.⁴⁷ The police have targeted the most vulnerable parts of the human

42. Emma Pierson, *Barr Says There’s No Systemic Racism in Policing. Our Data Says the Attorney General Is Wrong*, WASH. POST (June 20, 2020), <https://www.washingtonpost.com/politics/2020/06/20/barr-says-theres-no-systemic-racism-policing-our-data-say-attorney-general-is-wrong/> [https://perma.cc/57B6-STFG]. The underlying data was collected and analyzed by the Stanford Open Policing Project. *Data*, STAN. OPEN POLICING PROJECT, <https://openpolicing.stanford.edu/data/> [https://perma.cc/GC5E-J6HC].

43. See, e.g., THOMAS HARVEY, JOHN MCANNAR, MICHAEL-JOHN VOSS, MEGAN CONN, SEAN JANDA & SOPHIA KESKEY, ARCHCITY DEFENDERS: MUNICIPAL COURTS WHITE PAPER (2014), <https://www.archcitydefenders.org/wp-content/uploads/2019/03/ArchCity-Defenders-Municipal-Courts-Whitepaper.pdf> [https://perma.cc/DF3Q-8EQQ] (describing the policing and municipal court practices in Bel-Ridge, Florissant, and Ferguson, Missouri, of citing and imprisoning poor minority communities at disproportionate rates for ordinance violations and wielding the resulting fines and fees to produce municipal revenue).

44. Andrea J. Ritchie, *How Some Cops Use the Badge to Commit Sex Crimes*, WASH. POST (Jan. 12, 2018), https://www.washingtonpost.com/outlook/how-some-cops-use-the-badge-to-commit-sex-crimes/2018/01/11/5606fb26-eff3-11e7-b390-a36dc3fa2842_story.html [https://perma.cc/CWF3-9ZCR] (citing a study that found that in 2000, two in five young women in New York City—almost half of whom were Black, Latina, or Asian—reported sexual harassment by police officers); *The Cato Institute’s National Police Misconduct Reporting Project*, CATO INST. 1–2 (2010), <https://www.leg.state.nv.us/Session/77th2013/Exhibits/Assembly/JUD/AJUD338L.pdf> [https://perma.cc/4H6L-7RL6] (reporting that sexual misconduct was the second most common form of reported police misconduct in 2010); Matthew Spina, *When a Protector Becomes a Predator*, BUFFALO NEWS (Nov. 22, 2015), <https://s3.amazonaws.com/bncore/projects/abusing-the-law/index.html> [https://perma.cc/D79A-GK63] (“Every five days, a police officer in America is caught engaging in sexual abuse or misconduct.”).

45. See, e.g., Leigh Goodmark, *Hands Up at Home: Militarized Masculinity and Police Officers Who Commit Intimate Partner Abuse*, 2015 B.Y.U. L. REV. 1183, 1185–86, 1189–96 (2015) (noting studies suggesting that police officers are more likely than the general population to commit intimate partner abuse); *id.* at 1235–46 (describing 102 instances of intimate partner abuse by police officers).

46. Loren Grush, *Why Police Officers Embraced a Banned Weapon of War*, VERGE (Aug. 31, 2020, 9:10 AM), <https://www.theverge.com/21396099/tear-gas-protests-police-weapon-warfare-history-crowd-control> (last visited July 31, 2021).

47. PHYSICIANS FOR HUM. RTS., *CROWD-CONTROL WEAPONS AND SOCIAL PROTEST IN THE UNITED STATES* (2020), https://phr.org/wp-content/uploads/2020/06/PHR-Fact-Sheet_Crowd-Control-Weapons-and-Social-Protest-US.pdf [https://perma.cc/3CYU-AYDQ]; *Health Impacts of Crowd-Control Weapons: Chemical Irritants (Tear Gas and Pepper Spray)*, PHYSICIANS FOR HUM. RTS. (Jan. 1, 2017), <https://phr.org/our-work/resources/health-impacts-of-crowd-control-weapons-chemical-irritants-tear-gas-and-pepper-spray/> [https://perma.cc/3BE4-XNCZ]; *Health Impacts of Crowd-Control Weapons: Kinetic Impact Projectiles (Rubber Bullets)*, PHYSICIANS FOR HUM. RTS. (Jan. 1, 2017), <https://phr.org/our-work/resources/health-impacts-of-crowd-control-weapons-kinetic-impact-projectiles-rubber-bullets/> [https://perma.cc/UEH3-GWKBJ].

body⁴⁸ with these weapons and have robbed people of their cognitive abilities,⁴⁹ their eyes,⁵⁰ and their ability to have biological children.⁵¹ Indeed, as we know from the murder of George Floyd (among many others), even the weight of one's body can be lethal when wielded by the police.⁵²

Given the persisting abuses inflicted historically and systemically by the police,⁵³ abolitionist organizers have long explained that the institution

48. Liz Szabo, Jay Hancock, Kevin McCoy, Donovan Slack & Dennis Wagner, *Fractured Skulls, Lost Eyes: Police Often Break their Own Rules When Using "Rubber Bullets"*, COLO. SUN (June 21, 2020, 7:56 PM), <https://coloradosun.com/2020/06/21/denver-george-floyd-protests-police-force/> [<https://perma.cc/7PXU-XLEH>] (noting that nationwide, at least sixty protestors during the 2020 uprisings sustained serious head injuries, including traumatic brain injuries and severe eye injuries, due to police use of "less lethal" projectiles).

49. *Shot in the Head*, PHYSICIANS FOR HUM. RTS. (Sept. 14, 2020), <https://storymaps.arcgis.com/stories/29cbf2e87b914dbaabdec2f3d350839e> (last visited July 31, 2021) (documenting that crowd-control weapons have caused at least 115 head injuries across the United States during the 2020 uprisings).

50. Meg Kelly, Joyce Sohyun Lee & Jon Swaine, *Partially Blinded by Police*, WASH. POST (July 14, 2020, 7:31 PM), <https://www.washingtonpost.com/investigations/2020/07/14/george-floyd-protests-police-blinding/> (documenting at least eight instances where the use of police weapons caused eight people to suffer severe eye injuries) (last visited Aug. 9, 2021).

51. Alex Wigglesworth, *Community Organizer Who Trains Police on Bias Injured by Rubber Bullet During Protest*, L.A. TIMES (June 6, 2020, 7:31 PM), <https://www.latimes.com/california/story/2020-06-06/community-organizer-shot-by-rubber-bullet-during-protest> (last visited July 31, 2021).

52. See, e.g., Baker et al., *supra* note 2 (discussing how police officers "used their hands and knees to pin him down").

53. Organizers and scholars have long discussed the racist origins of policing structures in the United States and how that history seeps into, and inextricably poisons, modern-day policing. See, e.g., *Policing Timeline*, CRITICAL RESISTANCE (2021), <http://criticalresistance.org/policing-timeline/> [<https://perma.cc/3DSA-UGDG>] (providing a historical overview, beginning with colonization and the Trans-Atlantic Slave Trade, of the evolution of policing in the United States); MPD150, ENOUGH IS ENOUGH: A 150-YEAR PERFORMANCE REVIEW OF THE MINNEAPOLIS POLICE DEPARTMENT 8–15 (2020), https://www.mpd150.com/wp-content/uploads/reports/report_2_compressed.pdf [<https://perma.cc/D5V9-SMVV>] (documenting a people's history of the Minneapolis police department over the past 150 years, including its history as a corrupt political tool and its increasing violence towards Black and Native communities); Project NIA, *Defund Police*, YOUTUBE, at 1:09–1:58 (Oct. 13, 2020), <https://www.youtube.com/watch?v=bT0YpOmk8NA> [<https://perma.cc/YCL2-CSP9>] (discussing the origins of policing as efforts to capture escaped enslaved people, to marginalize Indigenous communities from white settlements, and to quash labor strikes); Akbar, *supra* note 23, at 1817–19 (discussing the work of abolitionist organizers and scholars who locate the history of policing within the history of enslavement and colonialism); Allegra M. McLeod, *Prison Abolition and Grounded Justice*, 62 UCLA L. REV. 1156, 1186–94 (2015) (describing the history of law enforcement as the "primary mechanism for the continued subordination of African Americans for profit" following the abolition of slavery); Dorothy E. Roberts, *Constructing a Criminal Justice System Free of Racial Bias: An Abolitionist Framework*, 39 COLUM. HUM. RTS. L. REV. 261, 276 (2007) (observing that the roots of police interrogation techniques can be traced to lynching); Michel Martin, *All Things Considered: The History of Policing and Race in the U.S. Are Deeply Intertwined*, NPR (June 13, 2020, 6:09 PM), <https://www.npr.org/2020/06/13/876628302/the-history-of-policing-and-race-in-the-u-s-are-deeply-intertwined> [<https://perma.cc/4G4H-CGFF>] (discussing the historical origins of

of policing is not broken—it is working effectively as designed.⁵⁴ These organizers and scholars note that conventional reforms seeking to “repair” the system by legitimizing or expanding the scale of policing have failed to achieve a reduction in police violence.⁵⁵ These organizers make plain that such reforms are “tantamount to rearranging the deck chairs on the Titanic”⁵⁶ and will only perpetuate existing violence.⁵⁷ They instead point to an abolitionist vision and explain that “[t]he only way to diminish police violence is to reduce contact between the public and the police.”⁵⁸

Abolition is the study and practice of transformation.⁵⁹ The movement

policing in slave patrols); Anna North, *How Racist Policing Took over American Cities, Explained by a Historian*, VOX (June 6, 2020, 8:00 AM), <https://www.vox.com/2020/6/6/21280643/police-brutality-violence-protests-racism-khalil-muhammad> [<https://perma.cc/2U5A-ECHM>] (discussing how Black criminality was perpetuated to subjugate and segregate Black communities); Ailsa Chang, *All Things Considered: The History of Police in Creating Social Order in the U.S.*, NPR (June 5, 2020, 4:13 PM), <https://www.npr.org/2020/06/05/871083599/the-history-of-police-in-creating-social-order-in-the-u-s> [<https://perma.cc/5PSC-AWZ3>] (discussing the origins of policing as labor control, including the control over enslaved populations).

54. CRITICAL RESISTANCE, OUR COMMUNITIES, OUR SOLUTIONS: AN ORGANIZER’S TOOLKIT FOR DEVELOPING CAMPAIGNS TO ABOLISH POLICING 16 (2020), http://criticalresistance.org/cr_abolish-policing-toolkit_2020/ [<https://perma.cc/CD7E-344E>]; *Black Liberation and the Abolition of the Prison Industrial Complex: An Interview with Rachel Herzog*, BLACK SCHOLAR (Sept. 6, 2016), <https://www.theblackscholar.org/black-liberation-abolition-prison-industrial-complex-interview-rachel-herzog/> [<https://perma.cc/LP92-MYA6>].

55. See, e.g., Mariame Kaba, Opinion, *Yes, We Mean Literally Abolish the Police*, N.Y. TIMES (June 12, 2020), <https://www.nytimes.com/2020/06/12/opinion/sunday/floyd-abolish-defund-police.html> [<https://perma.cc/E223-HQ7G>] (describing how traditional reforms to build “community support for law enforcement” and create police oversight were ineffective and instead “served as a . . . counterinsurgent function each time police violence led to protests”); MPD150, *supra* note 53, at 12–15 (outlining how promised reforms to the Minneapolis Police Department largely failed to materially improve the state of policing in the city); ROSE CITY COPWATCH, ALTERNATIVES TO POLICE 7–23 (2008), <https://rosecitycopwatch.files.wordpress.com/2010/03/alternatives-to-police-draft.pdf> [<https://perma.cc/N83J-MCLM>] (describing how safety can be achieved through alternatives to policing rather than maintaining policing systems).

56. Kim Pate, *A Canadian Journey Into Abolition*, in ABOLITION NOW!: TEN YEARS OF STRATEGY AND STRUGGLE AGAINST THE PRISON INDUSTRIAL COMPLEX 77 (2008), <http://criticalresistance.org/wp-content/uploads/2012/06/Critical-Resistance-Abolition-Now-Ten-Years-of-Strategy-and-Struggle-against-the-Prison-Industrial-Complex.pdf> [<https://perma.cc/35XK-MMBG>].

57. See, e.g., CRITICAL RESISTANCE, *supra* note 54, at 16 (noting, for example, that reforms adopted by police departments following publicized police killings have failed to stop the police from continuing to harm or kill); Kaba, *supra* note 55 (identifying various conventional reforms that have failed to reduce police violence); Sam Levin, *‘It’s Not About Bad Apples’: How U.S. Police Reforms Have Failed to Stop Brutality and Violence*, GUARDIAN (June 16, 2020, 6:00 AM), <https://www.theguardian.com/us-news/2020/jun/16/its-not-about-bad-apples-how-us-police-reforms-have-failed-to-stop-brutality-and-violence> [<https://perma.cc/5SSQ-VZ8L>] (identifying the demands of abolitionist organizers as well as studies demonstrating that conventional reforms like body cameras and mandatory trainings have not diminished violence by the police).

58. Kaba, *supra* note 55.

59. See, e.g., CRITICAL RESISTANCE, *supra* note 54, at 16 (describing abolition as a necessary “transformational demand”).

of abolition reflects a political vision for a world without police and prisons, but the object of transformation extends beyond the prison industrial complex⁶⁰—abolition also calls for the transformation of resources, systems of care, and our own understandings and assumptions of criminal punishment.⁶¹ As a theory of change, this movement “embrace[s] both a negative or deconstructive project of dismantling penal systems and a positive project of world-building”⁶² to progress “towards the horizon of abolition.”⁶³ It is a practice of absence as well as presence.⁶⁴

The deconstructive project emphasizes the need to “shrink” and “erode” the prison industrial complex, including the institution of policing, and to oppose any reforms that would expand its power, scale, or legitimacy.⁶⁵ Through this lens, abolitionist organizers work towards transformative changes that include stripping the police of their militarization and weaponry,⁶⁶ dismantling systems and methods of

60. The abolitionist organization Critical Resistance defines the prison industrial complex as “the overlapping interests of government and industry that use surveillance, policing, and imprisonment as solutions to economic, social, and political problems.” *What Is the PIC? What Is Abolition?*, CRITICAL RESISTANCE, <http://criticalresistance.org/about/not-so-common-language/> [https://perma.cc/83EQ-7NNQ].

61. Rachel Kushner, *Is Prison Necessary? Ruth Wilson Gilmore Might Change Your Mind*, N.Y. TIMES MAG. (Apr. 17, 2019), <https://www.nytimes.com/2019/04/17/magazine/prison-abolition-ruth-wilson-gilmore.html> [https://perma.cc/WT7R-GLN5].

62. McLeod, *supra* note 23, at 1617.

63. Mariame Kaba & John Duda, *Towards the Horizon of Abolition: A Conversation with Mariame Kaba*, NEXT SYS. PROJECT (Nov. 9, 2017), <https://thenextsystem.org/learn/stories/towards-horizon-abolition-conversation-mariame-kaba> [https://perma.cc/K858-WY4J].

64. Kushner, *supra* note 61 (citing the work and words of Ruth Wilson Gilmore).

65. *See, e.g.*, CRITICAL RESISTANCE, *supra* note 54, at 13 (identifying Critical Resistance’s approach to abolition as an organizing strategy to “shrink and starve” or “chip away” at institutions of policing, which includes “opposing any reforms that extend the life, scope, or scale of policing”).

66. *See, e.g.*, *The Demilitarization of Law Enforcement*, MOVEMENT FOR BLACK LIVES, <https://m4bl.org/policy-platforms/the-demilitarization-of-law-enforcement/> [https://perma.cc/MR6H-WMHT] (identifying the demilitarization of law enforcement as a demand of the Movement for Black Lives). For example, the Stop Urban Shield Coalition fights against the growing militarization of state violence by organizing to end “Urban Shield,” a special weapons and tactics (S.W.A.T.) training and weapons expo that allows local, regional, and international police military units to collaborate and profit from new modes of surveillance and state repression. *See* STOP URBAN SHIELD FACT SHEET, STOP URBAN SHIELD (2016), <http://stopurbanshield.org/wp-content/uploads/2016/08/StopUrbanShieldEnglishInfo.pdf> [https://perma.cc/WQ2K-37XY].

surveillance,⁶⁷ stopping the encroachment of police into schools,⁶⁸ transit systems⁶⁹ and other aspects of daily life, and otherwise shrinking the footprint of policing.⁷⁰ Simultaneously, the positive project takes concrete steps to build a world where police and prisons are rendered obsolete

67. See, e.g., *End the Surveillance on Black Communities*, MOVEMENT FOR BLACK LIVES, <https://m4bl.org/policy-platforms/end-surveillance/> [https://perma.cc/U8WK-DTDL] (identifying the end of surveillance on Black communities as a demand of the Movement for Black Lives). For example, the Stop the Injunctions Coalition organizes to end the use of “gang injunctions,” a suppression tool used by prosecutors and police that subject entire neighborhoods encompassed in a so-called “safety zone” to increased surveillance and harassment as police wield “extensive discretion to stop, interrogate, and gather information” on the people within that zone. Stop the Injunctions Coalition, *Our Oakland, Our Solutions*, in LIFE DURING WARTIME: RESISTING COUNTERINSURGENCY at 135–37, 144–45 (Kristian Williams et al. eds., 2013), https://drive.google.com/file/d/10pmTKoASLO4umAQcdUOx47_rc5s-xuGN/view [https://perma.cc/67ZY-GFKJ]. After years of organizing, STIC successfully moved the City Attorney’s Office to dismiss the injunctions. Press Release, Critical Resistance, Victory for Oakland Residents as City Attorney Dismisses Controversial Police Gang Injunctions (Mar. 6, 2015, 9:15 AM), <https://www.commondreams.org/newswire/2015/03/06/victory-oakland-residents-city-attorney-dismisses-controversial-police-gang> [https://perma.cc/KV4L-KAK4].

68. See, e.g., ADVANCEMENT PROJECT, WE CAME TO LEARN: A CALL TO ACTION FOR POLICE FREE SCHOOLS, 31–42 (2018), <https://advancementproject.org/wecametolearn/> [https://perma.cc/X522-KVS5] (calling for police-free schools and highlighting case studies of community organizing to end school policing). For example, in 2011, the Oakland-based and Black-led community organization Black Organizing Project launched its “Bettering Our School System” (BOSS) campaign to end the criminalization of Black and Brown students, remove police from Oakland schools, and invest in alternative models for school safety. BLACK ORGANIZING PROJECT, THE PEOPLE’S PLAN FOR POLICE-FREE SCHOOLS (2019), <https://blackorganizingproject.org/wp-content/uploads/2021/07/The-Peoples-Plan-2019-Online-Reduced-Size.pdf> [https://perma.cc/DH95-HNXA]; *Bettering Our School System*, BLACK ORG. PROJECT, <http://blackorganizingproject.org/bettering-our-school-system/> [https://perma.cc/BKD6-RA3A]. In 2020, after nearly nine years of organizing and leadership by community groups like Black Organizing Project, the Oakland School Board voted to dissolve the Oakland School Police Department and reinvest its budget into a new safety plan that will support students and combat the school-to-prison pipeline. Samuel Getachew, *Oakland Eliminated its School Police Force—So What Happens Now?*, KQED (Mar. 11, 2021), <https://www.kqed.org/arts/13893831/oakland-eliminated-its-school-police-force-so-what-happens-now> [https://perma.cc/TQV5-2GM7]; Edwin Rios, *How Black Oaklanders Finally Expelled the School Police*, MOTHER JONES (Nov. 2020), <https://www.motherjones.com/crime-justice/2020/10/how-black-oaklanders-finally-expelled-the-school-police/> (last visited July 31, 2021).

69. For example, community groups like Decolonize This Place organize to challenge police presence in spaces of public transportation throughout New York City and the subsequent criminalization of Black and Brown riders. See FTPIII OPERATIONS MANUAL 23 (2020), https://static1.squarespace.com/static/5c5e0c57d86cc9226827c754/t/5e1e7abd10e8a810447cb3b5/1579055814678/FTP3_OperationsManual.pdf [https://perma.cc/P6BC-VT5J]; Sarah Emily Baum, *MTA Protests in New York City Target Fare Hikes, Police Conduct*, TEEN VOGUE (Feb. 14, 2020), <https://www.teenvogue.com/story/mta-protests-new-york-city-ftp> [https://perma.cc/DK93-QKJU].

70. See, e.g., CRITICAL RESISTANCE, *supra* note 54, at 15 (noting areas where decreasing or removing police presence would stop encroachment into civic and social life, and police funding and power could be rerouted); SARAH-JI & MONICA TRINIDAD, A COMMUNITY COMPILATION ON POLICE ABOLITION 20–21, 30–31 (2016), https://issuu.com/ftpzines/docs/gbnf_zine_all [https://perma.cc/JB97-Y6FM] (discussing approaches to disarm and disband the police).

because community needs are fully met.⁷¹ This new world centers care and offers protections like guaranteed housing, universal healthcare, mental health and addiction support, free public education, and systems of accountability that do not rely on criminal punishment.⁷² Abolitionist organizers note that this affirmative world-building requires “a constellation of alternative strategies and institutions” of care and that “one single alternative to the existing system” will not suffice.⁷³

Demands to “defund the police” can achieve both the deconstructive and positive aspects of abolitionist organizing.⁷⁴ These demands acknowledge that municipalities often increased policing budgets without empirical justification while defunding budgets dedicated to healing and nourishing policed communities.⁷⁵ When aligned with the broader project of abolition, defund campaigns fight to reroute the billions of dollars earmarked for militarized policing into the resources necessary to rebuild policed communities, simultaneously shrinking the budgets and footprint of policing (negative project) while growing and reinvesting in systems to support community needs (positive project).⁷⁶

Abolitionist organizers understand that the process of dismantling the prison industrial complex will not be achieved overnight, and that even incremental reforms—so long as they seek to dismantle rather than maintain or strengthen policing infrastructures⁷⁷—can play a critical role

71. DREAM DEFS., DEFUND POLICE REBUILD OUR COMMUNITIES 4–5 (2020), <https://secure.everyaction.com/p/PN6aQpREDU6OccefBqxPmQ2> [<https://perma.cc/6B5T-KYBQ>].

72. *Id.*

73. ANGELA Y. DAVIS, ARE PRISONS OBSOLETE? 107–08 (2003).

74. It is important to note, as Professor Amna A. Akbar has observed, that not all demands to defund the police are abolitionist in nature and scope. Amna A. Akbar, *Demands for a Democratic Political Economy*, 134 HARV. L. REV. F. 90, 112 (2020). Where the purpose of the defund demand is to “recalibrate and relegitimate police function[s]” rather than to “contribute to an effort to delegitimize and dismantle policing,” it is not an abolitionist effort. *Id.*

75. KATE HAMAJI, KUMAR RAO, MARBRE STAHLY-BUTTS, JANAÉ BONSU, CHARLENE CARRUTHERS, ROSELYN BERRY & DENZEL MCCAMPBELL, FREEDOM TO THRIVE: REIMAGINING SAFETY & SECURITY IN OUR COMMUNITIES 1–4, 8–75 (2017), <https://www.populardemocracy.org/sites/default/files/Freedom%20to%20Thrive%2C%20Higher%20Res%20Version.pdf> [<https://perma.cc/W3HP-FBSY>]; Christopher Ingraham, *U.S. Spends Twice as Much on Law and Order as it Does on Cash Welfare, Data Show*, WASH. POST (June 4, 2020), <https://www.washingtonpost.com/business/2020/06/04/us-spends-twice-much-law-order-it-does-social-welfare-data-show/> [<https://perma.cc/9TDY-6DQV>]; Emily Badger & Quoc Trung Bui, *Cities Grew Safer. Police Budgets Kept Growing*, N.Y. TIMES (June 12, 2020), <https://www.nytimes.com/interactive/2020/06/12/upshot/cities-grew-safer-police-budgets-kept-growing.html> [<https://perma.cc/NH4F-YTBQ>].

76. See DREAM DEFS., *supra* note 71, at 4–5; MPD150, *supra* note 53; *Invest-Divest, MOVEMENT FOR BLACK LIVES* (2021), <https://m4bl.org/policy-platforms/invest-divest/> [<https://perma.cc/5FCX-5ETD>].

77. Various abolitionist organizers and organizations have provided resources to help analyze when a reform is “reformist” (maintaining or strengthening the prison industrial complex to the detriment

in the struggle towards an abolitionist horizon.⁷⁸ For example, campaigns to abolish targeted components of policing, such as campaigns for police-free schools, will not singlehandedly abolish the entire institution of policing.⁷⁹ But when realized, such campaigns can meaningfully diminish the footprint of policing and can contribute to “the deliberate, patient and persistent work necessary” to achieve abolition.⁸⁰

There is no one “blueprint for abolition,”⁸¹ but abolition provides a “transformative vision” that shapes a framework for concrete analysis and practical strategy.⁸² It is a discipline, not a slogan. And “[e]very vision is a map”⁸³—it shows us where we could go, and how to arrive at that horizon, if our imaginations opened to the possibility.

Examples of successful abolitionist projects are evident throughout history, if we take the care to look.⁸⁴ As this Essay explains, the creation of Freedom House Ambulance Service and the resulting end of ambulance

of the movement) rather than “non-reformist” or abolitionist (dismantling and shrinking the footprint of the PIC). In the context of policing, Critical Resistance has provided this guidance in a visual chart. CRITICAL RESISTANCE, *supra* note 54, at 19. Abolitionist organizer and educator Mariame Kaba also provides a written guide for evaluating the efficacy of a proposed reform. Mariame Kaba, *Police “Reforms” You Should Always Oppose*, TRUTHOUT (Dec. 7, 2014), <https://truthout.org/articles/police-e-reforms-you-should-always-oppose/> [<https://perma.cc/VA8B-88RZ>].

78. See, e.g., CRITICAL RESISTANCE, *supra* note 54, at 13 (observing that campaigns to cancel new jail construction contracts, close existing jails, or end gang injunctions can all contribute to the broader abolitionist movement). As Professor Allegra M. McLeod has observed, abolition can be conceptualized as “a transformative goal of *gradual* decarceration and positive regulatory substitution wherein penal regulation is recognized as morally unsustainable.” McLeod, *supra* note 53, at 1161 (emphasis added).

79. See Keeanga-Yamahtta Taylor, *The Emerging Movement for Police and Prison Abolition*, NEW YORKER (May 7, 2021), <https://www.newyorker.com/news/our-columnists/the-emerging-movement-for-police-and-prison-abolition> [<https://perma.cc/Q4HB-UKRR>] (“Abolition is not an all-or-nothing proposition. Even the guiding lights of the movement are embedded in campaigns for short-term reforms that make a difference in daily life.”).

80. See Ruth Wilson Gilmore & James Kilgore, *The Case for Abolition*, MARSHALL PROJECT (June 19, 2019, 6:00 AM), <https://www.themarshallproject.org/2019/06/19/the-case-for-abolition> [<https://perma.cc/PMS9-CKWU>].

81. Ji & TRINIDAD, *supra* note 70, at 13.

82. See Dan Berger, Mariame Kaba & David Stein, *What Abolitionists Do*, JACOBIN (Aug. 24, 2017), <https://www.jacobinmag.com/2017/08/prison-abolition-reform-mass-incarceration> [<https://perma.cc/452U-CSNH>].

83. Mariame Kaba, *So You’re Thinking About Becoming an Abolitionist*, LEVEL (Oct. 30, 2020), <https://level.medium.com/so-youre-thinking-about-becoming-an-abolitionist-a436f8e31894> [<https://perma.cc/NTW6-Z3D4>].

84. See, e.g., Garrett Felber, *The Struggle to Abolish the Police Is Not New*, BOSTON REV. (June 9, 2020), <http://bostonreview.net/race/garrett-felber-struggle-abolish-police-not-new> [<https://perma.cc/Z235-3NMB>] (observing that prison abolition was “woven into the last century’s civil rights movement” and identifying examples of abolitionist projects, including a two-week desegregation campaign known as the Journey of Reconciliation, the inaugural Conference on Prison Problems and the conversations and demands it fostered, as well as reports and treatises written by organizers challenging the carceral state).

policing offers one material example of the transformative change sought by abolition.⁸⁵ Although Freedom House was not an explicitly abolitionist proposal, the analysis and strategy informed by abolition offers an insightful lens to view its history as well as its enduring impact on modern American society.

II. ABOLISHING THE “SWOOP AND SCOOP”

Before applying an abolitionist analysis to the history of Freedom House in Pittsburgh, Pennsylvania, this Essay outlines the birth, success, and legacy of this revolutionary program. This Part begins with the police: it provides context for the practice of ambulance policing in the late 1960s in Pittsburgh as well as the brutality and neglect that motivated Black residents to create their own civilian ambulance force.⁸⁶ It ends with the city officials that defunded the program and reinvested in ambulance policing despite Freedom House’s objectively superior care.⁸⁷ Central throughout this history is the group of Black Freedom House paramedics who, in creating a system of care for their own community members, transformed the practice of emergency medical services and catalyzed the end of ambulance policing.⁸⁸

A. *Ambulance Policing in Pittsburgh, Pennsylvania*

Before modern ambulances, there was the police. Prior to the late 1960s, police departments and funeral homes often answered calls for help when people suffered injuries in the community.⁸⁹ Because most of these responders lacked first-aid training, there was little to no emergency care provided at the scene.⁹⁰ Instead, the priority was transportation: people were routinely delivered to nearby hospitals in police paddy wagons or hearses.⁹¹ Hearses were known to give a “two-way ride”—to deliver someone to the hospital and wait for the subsequent trip to the funeral home.⁹² The police engaged in a similar practice known as the

85. See *infra* Part II.C.

86. See *infra* Part II.A–B.

87. See *infra* Part II.D.

88. See *infra* Part II.C.

89. Anita Srikameswaran, *Pioneering Paramedic Crews from Late ‘60s Hold Reunion*, PITT. POST-GAZETTE, Nov. 7, 1997, at B2, <https://archives.post-gazette.com/image/90845088/> (last visited July 25, 2021); Edwards, *supra* note 30, at 441.

90. Edwards, *supra* note 30, at 441; Srikameswaran, *supra* note 89.

91. Srikameswaran, *supra* note 89.

92. *Id.*

“swoop and scoop”⁹³: officers placed patients in the back of their vehicles while the officers drove in front, abandoning the injured patient without treatment or care during the ride.⁹⁴

Pittsburgh, Pennsylvania was one such city where the police pulled “double-duty” as ambulance drivers in their precincts.⁹⁵ As a result, Pittsburgh suffered high rates of fatalities and injuries.⁹⁶ In the mid-1960s, prior to the creation of Freedom House, there were routinely 2,000 preventable deaths a year in the city.⁹⁷ A 1971 study demonstrated that the police provided inappropriate care to more than 62% of the patients it transported to a hospital emergency room.⁹⁸

One issue was training and medical neglect. Police officers received only a single ten-hour course in first aid⁹⁹—a regimen described by a local paper as “barely the Boy Scout level”¹⁰⁰—that did not include training in advanced first aid or cardiopulmonary resuscitation (more commonly known as CPR).¹⁰¹ This was well below the eighty hours then-

93. Timothy McNulty, *City’s New Operations Boss Up to the Job*, PITT. POST-GAZETTE, Jan. 20, 2003, at B5, <https://archives.post-gazette.com/image/92243591> (last visited July 25, 2021). This practice was also called the “scoop and run.” Edwards, *supra* note 30, at 444.

94. *Episode 405: Freedom House Ambulance Service*, *supra* note 30; Edwards, *supra* note 30, at 444.

95. Henry W. Pierce, *Ambulance Trips Fouled by Politics*, POST-GAZETTE DAILY MAG., June 1, 1968, <https://archives.post-gazette.com/image/88152694/> (last visited July 25, 2021). Although the police controlled much of Pittsburgh’s “ambulance” services at the time, they were supplemented by private ambulances—comprised largely of funeral homes—as well as the occasional firemen crew. Joyce M. Bessor, Letter to the Editor, *Ambulance Crews Need Training*, PITT. POST-GAZETTE, July 15, 1968, at 14, <https://archives.post-gazette.com/image/88154799> (last visited July 25, 2021); Dolores Frederick, *The Great Ambulance Debate: Lives Hinge on Better Emergency Care*, *Wecht Says*, PITT. PRESS, May 15, 1973, at 21, <https://archives.post-gazette.com/image/147876633/> (last visited July 25, 2020) [hereinafter *Lives Hinge on Better Emergency Care*]. Community members complained that all three entities were untrained and ill-equipped to provide emergency care. *See e.g.*, Bessor, *supra* (criticizing the ambulance services provided by funeral homes, fire departments, and policemen). A 1971 study determined that the level of inappropriate medical care was high for all three entities: 62% for the police, 78% for private ambulances and volunteer fire companies, and 77% for private cars. Dolores Frederick, *‘Get an Ambulance!’ Telemetry Keeps Doctor, Emergency Unit in Touch*, PITT. PRESS, July 25, 1972, at 27, <https://archives.post-gazette.com/image/149447771> (last visited July 25, 2021) [hereinafter *Telemetry Keeps Doctor in Touch*].

96. Ervin Dyer, *Ambulance Service Saved Day for Many*, PITT. POST-GAZETTE, Feb. 28, 2007, at D-2, <https://archives.post-gazette.com/image/96637494> (last visited July 25, 2021).

97. *Id.*

98. *Lives Hinge on Better Emergency Care*, *supra* note 95.

99. Dolores Frederick, *The Great Ambulance Debate: Just How Much Is a Life Worth?*, PITT. PRESS, May 16, 1973, at 25, <https://archives.post-gazette.com/image/147678868/> (last visited July 25, 2021).

100. Dolores Frederick, *Emergency Care Progress Bypasses City*, PITT. PRESS, May 2, 1973, at 70, <https://archives.post-gazette.com/image/147762720> (last visited July 25, 2021).

101. Frederick, *supra* note 99.

recommended nationally for “first level” or “basic” medical training.¹⁰² This same local paper observed that this dearth of training was likely intentional, as it exempted police officers from civil liability when transporting patients.¹⁰³

Another issue was deficient equipment. The police relied on “‘paddy wagon’ ambulances”¹⁰⁴ outfitted with only basic first aid kits, oxygen, a canvas stretcher, and blanket sheets.¹⁰⁵ Even for national standards developed at the time, these vans were largely underequipped with emergency care essentials.¹⁰⁶ And the police carried yet another limitation: jurisdiction. Because they were not permitted to leave the borders of their own borough or township, they were forced to take patients to the closest hospital—even if the patient required treatment at another, more distant hospital better equipped for the emergency.¹⁰⁷

The people of Pittsburgh expressed their skepticism and frustration with ambulance policing. In a 1968 letter to the editor in the Pittsburgh Post-Gazette, one resident noted the “sheer ignorance” of police officers who “further injured” people requiring medical assistance.¹⁰⁸ The resident observed that even where bystanders at the injury site could provide critical medical input, the police would belligerently refuse this aid.¹⁰⁹ For example, informing a cop “he is killing a girl by trying to rotate her head when he has not checked to see if she has neck or back injuries” would only risk arrest “for being a nuisance.”¹¹⁰ Another resident recalled his bewilderment while watching the police chalk an outline around the body of a person still alive on the street.¹¹¹ When he informed the officer that the person was still living, the officer responded, “Yeah, but not for long.”¹¹²

These practices affected many of the city’s residents, even its political leaders. After Pennsylvania Governor David Lawrence collapsed at a political rally in Pittsburgh from a heart attack in 1966, two officers

102. *Telemetry Keeps Doctor in Touch*, *supra* note 95.

103. Frederick, *supra* note 100.

104. *Lives Hinge on Better Emergency Care*, *supra* note 95.

105. Frederick, *supra* note 99.

106. *Id.*

107. Pierce, *supra* note 95.

108. Bessor, *supra* note 95.

109. *Id.*

110. *Id.*

111. Mike Moyle, *Freedom House Aids’ Hopes Fading*, PITT. POST-GAZETTE, June 20, 1974, at Second Section, <https://archives.post-gazette.com/image/89371802> (last visited July 25, 2021).

112. *Id.*

transported him to a nearby hospital in a police ambulance.¹¹³ Both officers rode in front, and neither tended to the patient in the rear of the vehicle.¹¹⁴ The Governor fortunately had a nurse who accompanied him, but she was unable to apply essential CPR procedures due to the high speed and instability of the ride.¹¹⁵ The lack of continuous resuscitation resulted in brain damage that led to the Governor's death.¹¹⁶

As one returned veteran remarked about this era: "If you got a gunshot in Vietnam, you stood a better chance of surviving than if you had a cardiac arrest in Downtown Pittsburgh."¹¹⁷

B. *Policing and Public Health Crises in Black Pittsburgh*

Many of Pittsburgh's residents suffered from the police's failures in emergency care, but the harms inflicted by ambulance policing (and policing more broadly) multiplied in the city's poorest Black neighborhoods.¹¹⁸ Both poverty and policing left a mark on the Hill District, a Black neighborhood adjacent to downtown Pittsburgh¹¹⁹ that would eventually become the birthplace of Freedom House.¹²⁰

For a time, the Hill District thrived as "the heart of [B]lack cultural life in Pittsburgh."¹²¹ But empty and manipulated plans for so-called "urban renewal" obliterated the neighborhood.¹²² In the 1950s and 60s, the city razed over 1,300 buildings and cleared roughly eighty blocks of residential life from the Hill,¹²³ displacing over 8,000 people and 400 businesses from the neighborhood.¹²⁴ The devastating impact of the city's divestment from the neighborhood was plain. By 1968, unemployment

113. Frederick, *supra* note 100.

114. *Id.*

115. *Id.*

116. *Id.*

117. Anita Srikameswaran, *Pioneer Medics to Gather Again*, PITT. POST-GAZETTE, Nov. 7, 1997, at B1, <https://archives.post-gazette.com/image/90845086/> (last visited July 25, 2021).

118. *See infra* Part II.B.

119. Jared Foretek, *The Story of the Pittsburgh Neighborhood that Inspired "Fences,"* NAT'L TR. FOR HISTORIC PRES. (Feb. 24, 2017), <https://savingplaces.org/stories/the-story-of-the-pittsburgh-neighborhood-that-inspired-fences> [<https://perma.cc/J4ZM-GQW6>].

120. *See infra* Part II.C.

121. Foretek, *supra* note 119.

122. *Id.*

123. *Id.*

124. Randy Fox, *Pittsburgh's Hill District: The Death of a Dream*, HUFFINGTON POST (Sept. 15, 2012), https://www.huffpost.com/entry/pittsburghs-hill-district-dream_b_1669867 [<https://perma.cc/MTV3-LQL4>].

was four to five times higher in the Hill than in the city as a whole.¹²⁵ A large percentage of the available housing suffered terrible conditions, and half of the Hill's families were impoverished.¹²⁶

Oppression arrived in yet another form: policing in Pittsburgh was then, as it is now, marked by routine racialized violence.¹²⁷ Community groups organized frequently to challenge the brutality of policing. In 1965, about 600 people attended a mass meeting organized in the Hill District to discuss police violence.¹²⁸ People remarked they were “tired of being abused because [they] are Black” and wanted to “show how enraged [they] are that a Black man is not safe in his home.”¹²⁹ Both longstanding patterns as well as recent incidents fueled the community's outrage.¹³⁰ In just the few months preceding this 1965 mass meeting, police had fatally shot a Black man who fled a sidewalk dice game,¹³¹ fatally shot a fleeing twenty-year-old Black youth,¹³² shot at a Black couple in their home while searching for an unrelated alleged suspect,¹³³ and had beaten and choked the Black mother of an alleged suspect in her home.¹³⁴ Black community leaders asked the city “to weed out that form of racial bigotry which expresses itself in physical brutality and hostility against [Black communities].”¹³⁵

125. Robert Johnson, *Negro Youths Rap Barr, Whitey at Hill District Gripes Forum*, PITT. PRESS, Feb. 16, 1968, at 12, <https://archives.post-gazette.com/image/148662102> (last visited July 26, 2021).

126. *Id.*

127. See, e.g., Brittany Hailer, *A History of Violence: Pittsburgh's Checkered Past with Excessive Force May Be to Blame*, PITT. CURRENT (June 2, 2020), <https://www.pittsburghcurrent.com/history-of-violence/> [<https://perma.cc/R6X4-9PAD>] (outlining a recent history of police violence in Pittsburgh beginning in the 1990s).

128. *Negroes to Hike to City Hall Today*, PITT. POST-GAZETTE, July 15, 1965, at 1, <https://archives.post-gazette.com/image/88016280> (last visited July 26, 2021).

129. *Id.*

130. *Id.*

131. Charles C. Robb, *MacBeth Ordered Held in Slaying*, PITT. POST-GAZETTE, Nov. 6, 1965, at 1, <https://archives.post-gazette.com/image/88671793/> (last visited July 26, 2021).

132. *Negroes Seek Probe of Cop 'Brutality': 3-Point Plan Presented to City Officials*, PITT. POST-GAZETTE, July 27, 1965, at 9, <https://archives.post-gazette.com/image/88018069/> (last visited July 26, 2021) [hereinafter *3-Point Plan Presented*].

133. *Rights Leaders Rip City Report on Shootings, Continue Protest*, PITT. PRESS, July 15, 1965, at 2, <https://archives.post-gazette.com/image/149262606> (last visited July 26, 2021).

134. *Id.*; *CORE Pickets Protest Scott Case*, PITT. PRESS, July 9, 1965, at 4, <https://archives.post-gazette.com/image/149197717> (last visited July 26, 2021).

135. *3-Point Plan Presented*, *supra* note 132. Other leaders shared similar demands. Charles Kindle of the Citizens Committee Against Police Brutality remarked that Black residents simply “want[ed] the rights of any other citizen under the law.” *'Citizen Brutality' on Police Stressed: Complaints Far Outnumber Charges Against Officers, Hill Panel Told*, PITT. PRESS, Sept. 16, 1965, at 2, <https://archives.post-gazette.com/image/149147221> (last visited July 26, 2021). And when Congress of Racial Equality's national director James Farmer arrived in Pittsburgh in 1965 to support local

Despite attempts to force the police to reckon with their violence,¹³⁶ the brutality of policing persisted. During a 1968 Hill District forum where Pittsburgh's Mayor intended to discuss issues experienced by community residents, about a hundred students staged a walk-out in protest.¹³⁷ The youth organizers collectively wrote a letter outlining the "dehumanizing" problems they continued to suffer, including "the mental and physical police brutality."¹³⁸ In 1969, when Black construction workers demonstrated to protest their exclusion from construction unions and employment, the police responded with violence.¹³⁹ Witnesses noted the officers' "club-flailing"¹⁴⁰ and "baton-swinging brutality"¹⁴¹ and declared that "the crucial factor" motivating the violence was the officers' "belligerent," "aggressive," and "hateful" attitude.¹⁴²

Louis Mason, a Pittsburgh City Councilor from 1970 to 1977, remarked that police behavior in Pittsburg was "too ingrained with racism to change."¹⁴³ Given this pattern of harm, Black residents were understandably reluctant to call the police even when experiencing a medical emergency. One former Hill resident explained that many did not trust the police, who often acted without constraint or fear of repercussion for their actions.¹⁴⁴ Another described the thinking of an injured Black man who saw a familiar cop approach in a moment of physical crisis:

organizing, he reminded his audience that "the laws of your state are wrong if they permit police to shoot a person merely on suspicion. . . . A badge, a blue shirt, a gun and a club have not made him my judge, jury, and executioner." Roger Stuart, *CORE Asks Civilian Rein on Police*, PITT. PRESS, July 28, 1965, at 14, <https://archives.post-gazette.com/image/149648790> (last visited July 26, 2021).

136. Alvin Rosensweet, *Negroes Vow Mass Rally Today: 'Police Brutality' March Planned on City Building*, PITT. POST-GAZETTE, July 15, 1965, at 1, <https://archives.post-gazette.com/image/88016253> (last visited July 26, 2021); *3-Point Plan Presented*, *supra* note 132; *Brutality Parley Today*, PITT. POST-GAZETTE, Nov. 3, 1965, at 5, <https://archives.post-gazette.com/image/88671306> (last visited July 26, 2021).

137. A Black youth organization named "the Organizers" distributed an open letter explaining that the mayor's visit was a "joke," criticized him for failing to acknowledge the issues flagged by community members in the Hill, and cited the following concerns: "garbage, inadequate housing, unemployment, lack of recreational facilities, the mental and physical police brutality, the exploitation, the rats, roaches, dirt, filth, disease, and the general dehumanizing [sic]." Johnson, *supra* note 125.

138. *Id.*

139. Oscar L. Arnal, Letter to the Editor, *Minister Defends Street Protests*, PITT. POST-GAZETTE, Sept. 3, 1969, at 8, <https://archives.post-gazette.com/image/88923068> (last visited July 27, 2021); Mimi Gray & Rich Gray, Letter to the Editor, *Maintain Police Escalated Violence*, PITT. POST-GAZETTE, Aug. 29, 1969, at 6, https://archives.post-gazette.com/image/?clipping_id=5611331 (last visited July 27, 2021).

140. Gray & Gray, *supra* note 139.

141. Arnal, *supra* note 139.

142. Gray & Gray, *supra* note 139.

143. Edwards, *supra* note 30, at 448-49.

144. *Episode 405: Freedom House Ambulance Service*, *supra* note 30.

“He’ll think the cop is going to bash his head in like he did before.”¹⁴⁵ Residents in the Hill struggled with “the indignity of calling the police for a ride.”¹⁴⁶

But even when Hill residents made the call, officers responded with neglect or indifference. Pittsburgh’s police force, which was largely comprised of white officers, routinely refused to enter the Hill District.¹⁴⁷ People bled to death waiting for service that would never arrive.¹⁴⁸ If officers did respond, they could be deliberately slow to appear¹⁴⁹—they came in time to “wrap[] the dead in body bags” or “transport [the injured] to hospitals without care.”¹⁵⁰ One former Hill resident recalled being seventeen years old when his mother suffered a cerebral hemorrhage in her home: his family called the police, but after the two white officers arrived, the officers falsely claimed that his mother was drunk and refused to help.¹⁵¹ He carried his mother out of the house in his arms and laid her in the only transport space available to them: the back of the paddy wagon. “I never saw her alive again,” he said.¹⁵²

C. *The Success of Freedom House*

Ambulance policing created a public health crisis that disproportionately impacted Pittsburgh’s residents of color, and those in the Hill grew increasingly more concerned about their access to medical care and emergency medical support.¹⁵³ This concern would eventually motivate a group of people to try securing the people’s access to medical care without reliance on the police.¹⁵⁴ One critical step towards this effort

145. Moyle, *supra* note 111. These fears are not unique to the Hill District; the long history of violence and brutality towards many minority communities in the United States has created a persisting mistrust of the police. *See, e.g.*, Rick Jervis, *Who Are Police Protecting and Serving? Law Enforcement Has History of Violence Against Many Minority Groups*, USA TODAY (June 15, 2020, 3:20 PM), <https://www.usatoday.com/story/news/nation/2020/06/13/mistrust-police-minority-communities-hesitant-call-police-george-floyd/5347878002/> [<https://perma.cc/44WL-LQ2S>] (observing that a history of police violence and aggression towards marginalized communities has created mistrust and fear of law enforcement).

146. Srikameswaran, *supra* note 89.

147. *Freedom House Ambulance Funding Challenged*, PITT. PRESS, Mar. 5, 1974, at 9, <https://archives.post-gazette.com/image/141909498> (last visited July 27, 2021); Moyle, *supra* note 111; Edwards, *supra* note 30, at 448; Dyer, *supra* note 96.

148. Dyer, *supra* note 96.

149. *Episode 405: Freedom House Ambulance Service*, *supra* note 30.

150. Dyer, *supra* note 96.

151. NEMSMA & EMS1, *supra* note 30.

152. *Id.*

153. *See supra* Part II.B; Srikameswaran, *supra* note 117; *see also* Edwards, *supra* note 30, at 450–52.

154. *See* Edwards, *supra* note 30, at 451; Dyer, *supra* note 96.

occurred in 1967, when a new organization, Freedom House Enterprises, Inc., made its appearance in the Hill.¹⁵⁵

Founded by local steelworkers union leader James McCoy, Jr., Freedom House was a Black-led non-profit organization that aimed to provide job training, develop Black-owned businesses and housing, and provide financial assistance to support the Hill's Black residents in the struggle for equality.¹⁵⁶ In its first two years, it launched a housing rehabilitation program, created job training courses, and established a mobile market of fruits and vegetables in the neighborhood.¹⁵⁷

Having heard concerns about the growing public health crisis in the Hill District, McCoy and other Hill residents grew interested in acquiring their own vehicles for transportation to the local hospital without police involvement.¹⁵⁸ With the assistance of Phil Hallen, the president of the Maurice Falk Medical Fund, Freedom House approached administrators at a local hospital for advice on acquiring such vehicles.¹⁵⁹ They were redirected to Dr. Peter Safar, the hospital's chairman of anesthesiology and "a leader in creating national standards for emergency personnel training."¹⁶⁰ Through this collaboration, Freedom House helped develop an entirely new, community-driven system of emergency medical care that would provide treatment in the field before transporting a patient to an emergency room without police involvement.¹⁶¹ In 1968, the city contracted with Freedom House to provide ambulance services in three underserved Black neighborhoods: the Hill District, part of the Oakland District, and downtown.¹⁶²

In the spirit of its mission of community investment, Freedom House recruited Black residents of the Hill District without stable employment

155. *Negro Leaders to Battle Slums*, PITT. PRESS, Jan. 19, 1967, at 18, <https://archives.post-gazette.com/image/149203492/> (last visited July 27, 2021).

156. *Id.*; *Realtors Back Fight on Blighted Housing*, PITT. PRESS, Feb. 19, 1967 (§ 7), at 101, <https://archives.post-gazette.com/image/149363966> (last visited July 27, 2021). At times, Freedom House also provided services and support to other Black neighborhoods beyond the Hill District. *See Housing Group Turns Hucksters*, PITT. PRESS, Feb. 21, 1967, at 32, <https://archives.post-gazette.com/image/149383536/> (last visited July 27, 2021).

157. *Realtors Back Fight on Blighted Housing*, *supra* note 156; Roger Stuart, *Food Industry Trains Negroes*, PITT. PRESS, Mar. 3, 1968, at 1, <https://archives.post-gazette.com/image/148888659> (last visited July 27, 2021); *Housing Group Turns Hucksters*, *supra* note 156.

158. Edwards, *supra* note 30, at 451; Srikameswaran, *supra* note 117.

159. Srikameswaran, *supra* note 117. This Pittsburgh hospital, what was then known as the Presbyterian University Hospital, is now the University of Pittsburgh Medical Center Presbyterian Hospital. Amato, *supra* note 30.

160. Srikameswaran, *supra* note 117.

161. Srikameswaran, *supra* note 89.

162. *Id.*; *Hill, Oakland Get Ambulance Plan*, PITT. PRESS, July 1, 1968, at 8, <https://archives.post-gazette.com/image/148285951> (last visited July 31, 2021).

to become the city's first fully-trained paramedics.¹⁶³ The initial class of twenty recruits completed an intensive thirty-two-week course developed by Dr. Safar¹⁶⁴ that included standard and advanced first aid, fifty hours of human anatomy and physiology, thirty-eight hours of emergency medical care, thirty hours of inhalation therapy, nineteen hours of resuscitation training, defensive driving, rescue techniques, and nursing, as well as weeks of observation and work in operating rooms, emergency rooms, and intensive care units.¹⁶⁵ This training program far exceeded the police's scant ten hours of "Boy Scout level" training.¹⁶⁶ Indeed, it even exceeded the eighty hours of "first level" medical training then-recommended nationally, and it became so successful that it formed the basis for a two-level National Research Council emergency medical technician's training recommendation.¹⁶⁷ Freedom House's ambulances were also equipped to national standards, eclipsing the basic first aid kits on board the police's paddy wagon ambulances.¹⁶⁸

The pilot program quickly grew from two vans to five.¹⁶⁹ In its first year alone, Freedom House paramedics transported over 4,600 patients,¹⁷⁰ for whom they managed life-threatening emergencies such as heart attacks, strokes, drug overdoses, seizures, and other severe injuries.¹⁷¹ These Black paramedics were among the first in the country to deliver an electric shock to a patient's heart in the field, intubate a patient on the street, or use Narcan to reverse an overdose.¹⁷² They were also among the first to introduce telemetry: to be in continuous contact with a doctor over the radio during in-field treatment.¹⁷³ "Freedom House was the proving ground for a lot of the things that are standard today," said John Moon, who would become one of Freedom House's most experienced

163. Dale McFeatters, 'Super' Ambulances Make Debut Here, PITT. PRESS, Apr. 8, 1969, at 12, <https://archives.post-gazette.com/image/148198324> (last visited July 31, 2021). Unemployment became, in fact, a requirement for entering the program. Srikameswaran, *supra* note 89.

164. Aims C. Coney, Letter to the Editor, *Provides Trained Ambulance Crews*, PITT. POST-GAZETTE, July 22, 1968, at 6, <https://archives.post-gazette.com/clip/41015699/freedom-house-ambulance-22-july-1968/> (last visited July 31, 2021).

165. Roger Stuart, *City Puts Brakes to Blacks' Ambulance Runs*, PITT. PRESS, Jan. 11, 1970, at 21, <https://archives.post-gazette.com/clip/53610010/freedom-house-loses-funding/> (last visited July 31, 2021); *Telemetry Keeps Doctor in Touch*, *supra* note 95.

166. Frederick, *supra* note 99; Frederick, *supra* note 100.

167. *Telemetry Keeps Doctor in Touch*, *supra* note 95.

168. *Lives Hinge on Better Emergency Care*, *supra* note 95.

169. *Telemetry Keeps Doctor in Touch*, *supra* note 95.

170. Stuart, *supra* note 165.

171. *Id.*

172. *Episode 405: Freedom House Ambulance Service*, *supra* note 30.

173. *Telemetry Keeps Doctor in Touch*, *supra* note 95.

paramedics.¹⁷⁴

Objectively, Freedom House ambulance crews provided care that was far superior to the police’s “swoop and scoop” approach. One study determined that the police provided inadequate or inappropriate care to 62% of its patients, as compared to Freedom House’s 11%.¹⁷⁵ Incredibly, the patients transported by the Freedom House had a fatality rate of only 1.9% before arriving at the hospital.¹⁷⁶

Increased training was certainly helpful towards elevating the standard of emergency care, but it was the absence of the police that was truly transformative. “[W]hen Freedom House goes someplace we’re going there for one purpose,” Freedom House director of operations Mitchell Brown once explained—the people knew they had no need to fear arrest or police retribution because Freedom House paramedics arrived solely to help the injured party.¹⁷⁷ That degree of trust was critical. Members of the neighborhood saw themselves in the paramedics, and one former resident of the Hill remembered a “warmth” and “connect[ion]” between the community and the paramedics serving them.¹⁷⁸

In the Hill District and beyond, “[s]end Freedom House[!]” quickly became a rallying cry when anyone required emergency care.¹⁷⁹ Freedom House’s reputation for providing superior care even traveled past its coverage areas, prompting white residents in neighborhoods outside of Freedom House’s jurisdiction to request its assistance for serious medical emergencies.¹⁸⁰

Freedom House not only saved people’s lives; it also protected people’s liberty. In 1975, Freedom House partnered with the Salvation Army to transport people under the influence of alcohol to a sobering center, where they would have an opportunity to receive medical attention, counseling, and shelter outside the criminal legal system.¹⁸¹ This decision to prioritize care over punishment would have had a significant impact given that approximately one-third of all arrests made in Pittsburgh around that time

174. NEMSMA & EMS1, *supra* note 30 (speaking in 2019).

175. *Telemetry Keeps Doctor in Touch*, *supra* note 95.

176. Stuart, *supra* note 165.

177. Moyle, *supra* note 111.

178. Srikameswaran, *supra* note 89.

179. Dyer, *supra* note 96.

180. Edwards, *supra* note 30, at 456.

181. *City Phasing in Drunk Program*, PITT. POST-GAZETTE, Jan. 16, 1975, at 5, <https://archives.post-gazette.com/image/89664874/> (last visited July 31, 2021); Jean Bryant, *Salvation Army Center Helps Drunks Find Way*, PITT. PRESS, Apr. 20, 1975, at A8, <https://archives.post-gazette.com/image/147458873/> (last visited Sept. 20, 2021) (noting that in lieu of the police, a Freedom House ambulance would transport inebriated community members to the program site).

were for public intoxication.¹⁸² A representative of the Salvation Army noted that in the neighborhoods where Freedom House operated, many individuals who were transported as part of the sobering program were also in need of medical attention and would benefit from Freedom House's expertise.¹⁸³ Freedom House drivers, he said, were "better judges" of the medical needs of patients under the influence than the police.¹⁸⁴

Freedom House paramedics did extraordinary work, but they were often forced to confront and overcome fierce defiance from the police. Under the city's contract with Freedom House, police dispatchers were responsible for forwarding calls to Freedom House ambulances in the neighborhoods where they operated—but police dispatchers often refused to do so.¹⁸⁵ Officers believed that the ambulance driver jobs "belong[ed] to them" and were territorial with what they considered to be their jurisdiction.¹⁸⁶ After suspecting that the police were withholding emergency calls, Freedom House paramedics purchased police radios or programmed the police frequency onto their own radios to intercept police dispatch communications.¹⁸⁷

But police resistance was not limited to a refusal to forward calls. When Freedom House paramedics arrived at the scene, police officers could be hostile or unaccepting.¹⁸⁸ John Moon recalled seeing the police dragging patients out of wrecked cars—when he and his crew tried to explain that the patient needed to be placed on a spine board with a cervical collar, the police "cuss[ed] [them] out."¹⁸⁹ In some situations, the police threatened Freedom House paramedics with arrest if they tried to intervene.¹⁹⁰

But the various forms of police resistance could not dampen Freedom House's success. Throughout the course of the program, Freedom House trained more than fifty people to provide on-the-ground assessments and care.¹⁹¹ These paramedics, the city's first, prototyped the modern ambulance, revolutionized the delivery of emergency medical services,

182. *Id.*

183. *Id.*

184. *Id.*

185. *Episode 405: Freedom House Ambulance Service*, *supra* note 30.

186. Eugene P. DePasquale, Letter to the Editor, 'Happy Medium' Ambulance Service, *PITT. POST-GAZETTE*, July 3, 1974, at 6, <https://archives.post-gazette.com/image/88939279/> (last visited Sept. 20, 2021).

187. Hazzard, *supra* note 30; Edwards, *supra* note 30, at 456.

188. *Episode 405: Freedom House Ambulance Service*, *supra* note 30.

189. *Id.*

190. *Id.*

191. Srikameswaran, *supra* note 89.

and treated approximately 45,000 emergencies in neighborhoods that had been historically neglected by the police.¹⁹² As a longtime Hill District resident once remarked, “Freedom House was the acorn from which this big oak called paramedic services sprang . . . I don’t think I’ll ever forget the way they made me feel.”¹⁹³

D. *The Defunding of Freedom House*

After demonstrating its many successes, Freedom House aspired to provide advanced medical care citywide.¹⁹⁴ Freedom House offered to expand its services to the entire city at an estimated cost of \$1.2 million per year—the same amount needed to operate the police’s paddy wagon ambulances throughout the rest of the city.¹⁹⁵ The City Task Force of the Western Pennsylvania Coalition for Human Needs urged Pittsburgh to use funds of \$550,000, already approved by the City Council, for this proposed expansion.¹⁹⁶ But instead, after Mayor Peter Flaherty replaced Mayor Joseph Barr in 1970, the city cut its funding to Freedom House in half.¹⁹⁷

City officials claimed the decision was an “economic necessity” due to budgetary concerns, and Freedom House was forced to return its jurisdiction over downtown ambulance services to the police.¹⁹⁸ But at the time, the costs of running the police ambulance service often exceeded the costs of maintaining Freedom House. The average price of a Freedom

192. *Id.*; see *supra* Part II.B.

193. Srikameswaran, *supra* note 89.

194. Mike Moyle, *Freedom House Gets Funds for '75*, PITT. POST-GAZETTE, Sept. 24, 1974, at 13, <https://archives.post-gazette.com/image/88847201> (last visited July 31, 2021).

195. *Telemetry Keeps Doctor in Touch*, *supra* note 95.

196. *Freedom House Ambulance Funding Challenged*, PITT. PRESS, Mar. 5, 1974, at 9, <https://archives.post-gazette.com/image/141909498> (last visited July 31, 2021).

197. *Telemetry Keeps Doctor in Touch*, *supra* note 95. A combination of city funds, federal funds, and private donations comprised the budget for Freedom House. *Ambulance Service in City Folding Up*, PITT. PRESS, May 30, 1974, at 2, <https://archives.post-gazette.com/image/141937052> (last visited July 31, 2021); *Freedom House Grant from City 11 Months Late*, PITT. PRESS, Nov. 29, 1973, at 2, <https://archives.post-gazette.com/image/141716899> (last visited Sept. 20, 2021). Mayor Flaherty took additional actions that impeded Freedom House’s operations, such as prohibiting Freedom House’s use of ambulance sirens, and allegedly also used racial slurs when referencing Freedom House. Amato, *supra* note 30. Although Flaherty is often named as the person politically responsible for the decisions to defund Freedom House, see Dyer, *supra* note 96, it is important to note that the City Council appropriated budget allocations (at times over the Mayor’s objections) and approved budget plans proposed by the Mayor. See Dolores Frederick, *City’s 5 ‘Super Ambulances’ Ready for Road, but Await Plan*, PITT. PRESS, Aug. 18, 1975, at 2, <https://archives.post-gazette.com/image/147918570> (last visited July 31, 2021) [hereinafter *Ready for Road, but Await Plan*]; *City Okays New Budget*, PITT. PRESS, Jan. 2, 1970, at 2, <https://archives.post-gazette.com/image/141388255/> (last visited Sept. 20, 2021).

198. Stuart, *supra* note 165.

House ambulance was less than half the cost of a paddy wagon ambulance, and Freedom House paramedics' salaries were only two-thirds of what police officers received.¹⁹⁹ Although Freedom House and its ambulance crew had demonstrated that they could do much more with a smaller budget,²⁰⁰ they were nonetheless forced to reduce their service to the city. Problems arose again in 1973, when the city delayed its contractual payments to Freedom House.²⁰¹ A year later, a city councilman accused Flaherty of bypassing grants that could have further sustained or even expanded Freedom House.²⁰²

The year 1974 would become significant for the future of Freedom House. That year, Flaherty announced a plan to launch a new ambulance network that would be operated and managed by the police.²⁰³ Following the advice of law enforcement advisors,²⁰⁴ he originally intended to train uniformed, armed police officers to staff sixteen emergency vehicles: eleven specially designed new vans and five mobile intensive care units, which local newspapers described as “super ambulances.”²⁰⁵ Flaherty's design did not include Freedom House or its paramedics, who faced immediate threats of losing their livelihoods.²⁰⁶

Local newspapers published editorials urging the city to “[s]ave

199. *Telemetry Keeps Doctor in Touch*, *supra* note 95. The average cost of a Freedom House van ambulance that met national standards at the time was approximately \$7,000, compared to the approximately \$17,000 cost for an “unequipped heavy-duty ‘station wagon’ vehicle[]” used by the police. *Id.* Freedom House paramedics were paid \$153 per week, while city police were paid about \$230 per week. *Id.* Although this Essay identifies the existence of this salary difference, it in no way intends to justify this difference. It is important to note ongoing efforts to improve the benefits and salaries of emergency medical technicians and paramedics, who have systemically suffered pay disparities and inequities despite providing essential frontline services. *See, e.g.*, Editorial Board, *Emergency Medical Workers Deserve Pay Equity*, N.Y. TIMES (Sept. 21, 2019), <https://www.nytimes.com/2019/09/21/opinion/sunday/emt-paramedics-salary.html> [<https://perma.cc/CKM6-CW7M>] (highlighting efforts by New York paramedics and emergency medical technicians to fight for pay equity and noting claims that this disparity is a matter of racial and gender discrimination, given the more diverse composition of emergency medical services).

200. *See supra* Part II.C.

201. John Golightly, *Ambulance Aid Awaited*, PITT. POST-GAZETTE, Nov. 30, 1973, at 7, <https://archives.post-gazette.com/image/90048204/> (last visited July 31, 2021).

202. *Pete Ripped in Ambulance Stall*, PITT. PRESS, June 9, 1974, at A8, <https://archives.post-gazette.com/image/147330072/> (last visited July 31, 2021).

203. *Ambulance Service in City Folding Up*, *supra* note 197.

204. Fritz Huysman, *City's Superambulances with Trained Paramedics Successful in Saving Lives*, PITT. POST-GAZETTE, May 3, 1976 (§ 2), at 13, <https://archives.post-gazette.com/image/89392048/> (last visited July 31, 2021).

205. *City to Ask Bids on Ambulance Super-Fleet*, PITT. PRESS, Oct. 13, 1974, at A2, <https://archives.post-gazette.com/image/147359055> (last visited July 31, 2021); *Ambulance Service in City Folding Up*, *supra* note 197.

206. *Ambulance Service in City Folding Up*, *supra* note 197.

Freedom House.”²⁰⁷ Community groups gathered public support for Freedom House’s extension by organizing rallies, scheduling press conferences, and filling the seats at a City Council hearing.²⁰⁸ As one coalition member said, it was “foolish” and “insulting” to allocate half a million dollars to the police for training and equipment when Freedom House, a community-led ambulance service with proven success, could easily be continued and expanded.²⁰⁹ A vice principal of a high school that had experienced Freedom House’s services argued it would be “unconscionable” to eliminate it.²¹⁰ Other city residents noted the hypocrisy of media outlets in acknowledging the superior care offered by Freedom House while at the same time failing to advocate for expansion of the program, and instead allowing the power of the police to flourish.²¹¹

Faced with such public outcry, the city eventually approved the scant funding needed to extend Freedom House’s operations until the end of 1974.²¹² But it refused to invest in the citywide expansion of Freedom House’s services—even though the press, Pittsburgh residents, and the medical community alike all recognized that Freedom House served as a model for ambulance services.²¹³ One local editorial noted that Freedom House provided a “superior ambulance program serving an important minority,” and it observed the irony that the very deficiencies in the police’s ambulance system requiring Freedom House’s existence would motivate the city to invest solely in the police.²¹⁴

When asked why the city would not invest in an ambulance program like Freedom House, Flaherty responded that a city ambulance was “a

207. Editorial, *Save Freedom House*, PITT. PRESS, June 10, 1974, at 20, <https://archives.post-gazette.com/image/147334609> (last visited July 31, 2021).

208. Mike Anderson, *Freedom House Support Mounting*, PITT. PRESS, June 15, 1974, at 2, <https://archives.post-gazette.com/image/147337393> (last visited July 31, 2021); Editorial, *Keep Freedom House*, PITT. POST-GAZETTE, June 19, 1974, at 6, <https://archives.post-gazette.com/image/89371729> (last visited July 31, 2021); David Warner, *Continuation of Ambulance Up to Board*, PITT. PRESS, June 22, 1974, at 2, <https://archives.post-gazette.com/image/147342857/> (last visited July 31, 2021).

209. Anderson, *supra* note 208.

210. Sidney Feiler, Letter to the Editor, *Freedom House Didn’t Fail Us*, PITT. POST-GAZETTE, June 22, 1974, at 6, <https://archives.post-gazette.com/image/89371887> (last visited July 31, 2021).

211. Molly Rush, Letter to the Editor, *Let Freedom House Serve Whole City*, PITT. POST-GAZETTE, June 22, 1974, at 6, <https://archives.post-gazette.com/image/89371887> (last visited July 31, 2021).

212. David Warner, *Ambulance Granted Stay*, PITT. PRESS, June 21, 1974, at 1, <https://archives.post-gazette.com/image/147342709> (last visited July 31, 2021).

213. *City Rescues Ambulances as Council OKs \$50,000*, PITT. PRESS, June 11, 1974, at 10, <https://archives.post-gazette.com/image/147334901> (last visited July 31, 2021).

214. *Keep Freedom House*, *supra* note 208.

public safety function” that should be operated by the police.²¹⁵ Based on a review of the press coverage at the time, it does not appear that Flaherty provided the public any data or concrete explanations for why the police, who had historically inflicted such widespread harm (especially in Pittsburgh’s Black neighborhoods),²¹⁶ would yet again be entrusted with ambulance policing. Freedom House’s ambulance program was created to “fill[] a void in ambulance service to . . . [B]lack neighborhoods,”²¹⁷ a void forged by police violence and racism,²¹⁸ and yet it appears that Flaherty’s empty assertion of “public safety” did nothing to acknowledge the threat to health and safety inflicted on Black neighborhoods by the continued practice of ambulance policing.

Freedom House operating manager Mitchell Brown questioned Flaherty’s “public safety” claim and stated there was no example anywhere in the country of the police providing the same level of care that Freedom House offered.²¹⁹ State Representative K. Leroy Irvis criticized Flaherty’s office as “obstructive” and called for a “public outcry” in support of Freedom House.²²⁰ If the city’s plan went through, he warned that Freedom House would be replaced with inferior services at a higher cost.²²¹ Dr. Safar joined the critiques and blamed the city’s mistreatment of Freedom House on “racial prejudices with white police officers eager to maintain control of ambulances city-wide.”²²² He described the police’s paddy-wagon ambulances as a “disgrace”²²³ and organized twenty-two physicians and community leaders to join him in an open letter criticizing the police force.²²⁴

The proposed cancellation of Freedom House was tragic for another reason: it was the last remaining city-funded program in Pittsburgh to provide job training for Black residents.²²⁵ As Freedom House paramedic Eugene Key explained, “[t]his is the last antipoverty program which still

215. *Ambulance Gets Extension Funds*, PITT. PRESS, June 21, 1974, at 1, <https://archives.post-gazette.com/image/147342728> (last visited July 31, 2021). Flaherty also claimed there were unspecified “legal questions” if the city funded Freedom House to provide services citywide. Warner, *supra* note 208.

216. *See supra* Parts II.A and II.B.

217. Moyle, *supra* note 111.

218. *See supra* Part II.B.

219. Anderson, *supra* note 208.

220. *Id.*

221. Alvin Rosensweet, *NAACP Protests End to Ambulance Service*, PITT. POST-GAZETTE, June 15, 1974 (§ 2), at 11, <https://archives.post-gazette.com/image/89371596> (last visited July 31, 2021).

222. Hazzard, *supra* note 30.

223. Edwards, *supra* note 30, at 455.

224. *Id.* at 458.

225. Anderson, *supra* note 208.

survives in the city . . . [a]nd now they want to get rid of it, too.”²²⁶ Tim Stevens, then-executive director of the NAACP, branded the proposed phase-out as part of “a pattern of ripoff in [B]lack programs in Pittsburgh and across the nation.”²²⁷

Eventually, in September 1974, the City appropriated enough funds for Freedom House to continue until the end of the following year—but it was careful to emphasize that this new block of funds was nothing more than a temporary reprieve until its citywide ambulance plan could formally begin.²²⁸ By the fall of 1974, Flaherty’s plans for a citywide police ambulance force were well underway. A hundred police officers had already taken courses at a local hospital on operating the “[a]mbulance [s]uper-[f]leet” planned for the force, and these officers were on track to have eighty hours of training by the end of the year.²²⁹

In May 1975, after months of suspense, Flaherty announced a change to his plan: the five “super ambulances,” which he called “mobile intensive units,” would be operated by civilian paramedics.²³⁰ But police officers would continue to operate the eleven “conventional” police ambulances, many of them newly purchased, to handle the “less severe cases.”²³¹ City police dispatchers would be responsible for choosing whether police or civilian responders were assigned to an emergency call,²³² and it was uncertain whether these “super ambulances” would be located in police stations or in hospitals.²³³ This could be seen as a qualified victory for advocates who had warned against police presence in emergency care, but it would nonetheless betray Freedom House’s future.

Rather than expanding Freedom House citywide, the city decided to end the program altogether. By August 1975, about 130 police officers had received forty hours of “basic emergency care” training in

226. Moyle, *supra* note 111.

227. Rosensweet, *supra* note 221

228. Moyle, *supra* note 194.

229. *City to Ask Bids on Ambulance Super-Fleet*, *supra* note 205.

230. *Flaherty Answers Emergency Call*, PITT. POST-GAZETTE, May 23, 1975, at 6, <https://archives.post-gazette.com/image/88532696> (last visited July 31, 2021); *Pete’s Program: Civilians to Man New Ambulances*, PITT. POST-GAZETTE, May 2, 1975, at 6, <https://archives.post-gazette.com/image/88530077> (last visited July 31, 2021) [hereinafter *Pete’s Program*].

231. *City Superambulance to Roll*, PITT. PRESS, Aug. 24, 1975, at A22, <https://archives.post-gazette.com/image/147953701> (last visited July 31, 2021); *Pete’s Program*, *supra* note 230; Al Donalson, *Superambulance Plan Lacks Warmth, Empathy, City Told*, PITT. PRESS, Oct. 24, 1975, at 3, <https://archives.post-gazette.com/image/147540832> (last visited July 31, 2021).

232. *City Superambulance to Roll*, *supra* note 231.

233. *Pete Got Election Funds from Trio Tied to Pavillion*, PITT. POST-GAZETTE, Aug. 7, 1975, at 1, <https://archives.post-gazette.com/image/88530284> (last visited July 31, 2021).

anticipation of the rollout of the new citywide plan.²³⁴ And on October 15, 1975, after answering more than 40,000 calls for aid during its seven years of operation, Freedom House Ambulance Service was forced to shut its doors.²³⁵

After Freedom House was forced to close, there was no public announcement, formal ceremony, or official recognition for the service that Freedom House paramedics had provided to the city.²³⁶ As Freedom House medical director Dr. Nancy Caroline later reflected, these paramedics “gave so much of themselves” to “clear[] the path for the kind of paramedic services now glorified,” but they themselves were “shunted aside, forgotten, left to return to the street corners and watch the parade pass them by.”²³⁷

Freedom House paramedics could apply to the city’s civilian paramedic force, but certain barriers excluded many of the experienced and talented paramedics that the city’s service would have been lucky to retain.²³⁸ Those who had criminal records were not allowed to join the service, despite their years of experience and proven reentry.²³⁹ The service imposed new tests that covered content beyond what Freedom House paramedics should have been responsible for, artificially failing many paramedics.²⁴⁰ Many who passed the tests were placed in positions below their qualifications.²⁴¹ Freedom House paramedics had pioneered this work, and yet many were rejected for promotions that instead went to more inexperienced white men.²⁴² “[I]t was like living in ‘Pittsburgh, Mississippi,’” a Freedom House paramedic recalled.²⁴³ Over the course of a year, twenty of the thirty Freedom House paramedics who had initially tried to stay on were “weeded out” of the department.²⁴⁴ Pittsburgh’s

234. *Ready for Road, but Await Plan*, *supra* note 197.

235. Ryan Corbett Bell, *The Next Page: Freedom House Ambulance — ‘We Were the Best,’* PITT. POST-GAZETTE (Oct. 25, 2009, 1:00 AM), <https://www.post-gazette.com/ae/books/2009/10/25/The-Next-Page-Freedom-House-Ambulance-We-were-the-best/stories/200910250176> [<https://perma.cc/4F2C-AYV7>].

236. Hazzard, *supra* note 30.

237. Edwards, *supra* note 30, at 464.

238. *See* Dyer, *supra* note 96.

239. Amato, *supra* note 30.

240. Dyer, *supra* note 96; Amato, *supra* note 30.

241. Hazzard, *supra* note 30.

242. Amato, *supra* note 30.

243. *Id.*

244. Rich Lord, *Outspoken Assistant EMS Chief Retiring from City*, PITT. POST-GAZETTE, Oct. 12, 2009, at A7, <https://archives.post-gazette.com/image/96492105> (last visited July 24, 2021) (quoting John Moon). However, it is important to honor the careers of Freedom House paramedics who were

civilian paramedic force would later go an entire decade without hiring a single Black employee.²⁴⁵

Once Flaherty's citywide plan was implemented, familiar issues resurfaced. The police "displayed animosity" towards the civilian paramedics, as they did against Freedom House, "because they felt the paramedics were taking part of their jobs."²⁴⁶ One local paper described the police as so "jealous[]" of their civilian counterparts that they instigated a "rivalry" against these trained medical professionals.²⁴⁷ Even where the dispatcher recognized an emergency warranting the trained civilian crew, unqualified police officers often "scoop[ed] patients" in a police ambulance before the trained civilian paramedics arrived.²⁴⁸ According to the emergency medical services (EMS) director at the time, the police continued to fail to understand that the speed of the drive could not be equated to quality of care.²⁴⁹ The director went so far as to say that he did not want the police to answer any ambulance calls.²⁵⁰ His vision for a police-free civilian paramedic force would eventually come to fruition: in under a decade, Pittsburgh's EMS department grew from a \$500,000 budget and forty-person staff to a \$6.5 million budget and 200-person staff, and it eventually supplanted the city's system of paddy wagon ambulances.²⁵¹

Despite the vital role that Freedom House played in developing emergency medical services, the country's memory largely moved forward without honoring its remarkable work. For example, a history of emergency medical services outlined by National Emergency Medical Services Education Standards makes no mention of Freedom House and instead recognizes Dr. Eugene Nagel for launching the nation's "first" paramedic program in Miami, Florida, one year after Freedom House

able to persist despite all the various barriers. For example, Mitchell Brown became Commissioner for Emergency Medical Services (EMS) in Cleveland, Ohio, directed the Department of Public Safety in Columbus, Ohio, and later became a City Councilmember in Columbus. *Mitchell J. Brown*, CITY OF COLUMBUS CITY COUNCIL, <https://www.columbus.gov/council/mbrown/> [<https://perma.cc/LCP9-8RNL>]. John Moon served over thirty years as a paramedic in Pittsburgh, eventually rising to become Assistant Chief before retiring in 2009. Lord, *supra* note 244. Near the end of his tenure, Moon filed a lawsuit alleging racial discrimination in the department's promotions. *Id.*

245. Lord, *supra* note 244.

246. *Paramedics Respond Well to 911 Emergency Phone*, PITT. POST-GAZETTE, June 23, 1980, at 1, <https://archives.post-gazette.com/image/88931680> (last visited July 24, 2021) [hereinafter *Paramedics Respond Well*].

247. Huysman, *supra* note 204.

248. *Safety*, PITT. PRESS, Nov. 18, 1984, at B1, <https://archives.post-gazette.com/image/146574125> (last visited July 24, 2021).

249. *Id.*

250. *Paramedics Respond Well*, *supra* note 246.

251. *Safety*, *supra* note 248.

began its ambulance service.²⁵² Dr. Caroline lamented in an unpublished manuscript that Freedom House should have been known as “the success story of the century.”²⁵³

But no matter how fallible our national memory is, Freedom House’s place in history cannot be erased. As Mitchell Brown, Freedom House’s operations director, reflected a week after Freedom House’s last day:

We were the first. We developed a little known area—emergency ambulance care by trained technicians—into a successful model which has been copied by other municipalities across the country People swore by us because they knew we cared. We cared because many of us came from the sections where we operated We were good, and the people—all the people—came to recognize that fact.²⁵⁴

III. THROUGH THE LENS OF FREEDOM HOUSE

Today, we take the legacy of Freedom House for granted. In cities like Pittsburgh, the return of “swoop and scoop” paddy wagon ambulances would now be unfathomable given the superior care modeled by Freedom House paramedics and replicated nationwide. And yet, at the time of Freedom House’s conception, it was radical to suggest that this responsibility be assigned to anyone but the police.

This community-driven intervention, although not self-defined as abolitionist, nonetheless offers an example of transformative change aligned with abolitionist principles. Freedom House Ambulance Service realized both positive and deconstructive abolitionist achievements. The program provided training, stable employment, and developed Black

252. NAT’L HIGHWAY TRAFFIC SAFETY ADMIN., NATIONAL EMERGENCY MEDICAL SERVICES EDUCATION STANDARDS: PARAMEDIC INSTRUCTIONAL GUIDELINES 2 (2009), https://www.ems.gov/pdf/education/National-EMS-Education-Standards-and-Instructional-Guidelines/Paramedic_Instructional_Guidelines.pdf [<https://perma.cc/N78V-XHMX>].

253. Edwards, *supra* note 30, at 464.

254. Donalson, *supra* note 231. Although the history of Freedom House has arguably not gained the national recognition or acclaim it deserves, it has been commemorated in smaller (but nonetheless important) ways. For example, as a symbolic measure, today’s EMS vehicles in Pittsburgh depict Freedom House’s emblem. NEMSMA & EMS1, *supra* note 30. In 2013, the National Highway Traffic Safety Administration awarded a public service award to Freedom House. *Id.* An effort in St. Paul, Minnesota, to train young people from disadvantaged neighborhoods to become emergency medical technicians was renamed “Freedom House Station 51” in honor of Freedom House’s legacy. *Id.* And in late 2020, the University of Pennsylvania Medical Center launched “Freedom House 2.0” in Pittsburgh, a training program that provides a ten-week first responder training to individuals from economically disadvantaged communities. Taylor Andres, *UPMC & UPMC Health Plan Launch Freedom House 2.0 to Support Economically Disadvantaged Individuals*, UPMC: INSIDE LIFE CHANGING MEDICINE (Dec. 17, 2020), <https://inside.upmc.com/freedom-house-2-launch/> [<https://perma.cc/H8SF-9FFX>].

leadership in a neighborhood chronically underserved and abandoned by the city of Pittsburgh,²⁵⁵ achieving the positive project of abolition. As for its deconstructive elements, it eventually stripped the police bureau of what was then considered a core police function,²⁵⁶ thereby reducing the legitimacy and footprint of policing. It even collaborated in the operation of sobering centers to ensure that, for a time, the city responded to alcohol dependency not with criminalization and punishment, but with voluntary treatment and care.²⁵⁷ Ultimately, the success of Freedom House paramedics proved the inherent flaws of ambulance policing, and it forced the city to eventually recognize and confront the limits of conventional reforms. No amount of training, sophisticated equipment, or funding would adequately reduce the harms inflicted by police ambulance drivers.²⁵⁸ The only pragmatic solution was abolition.

Unfortunately, eliminating “swoop and scoop” police ambulances has not eliminated the broader harms of 911 policing. Although the police generally no longer work as ambulance drivers, they continue to be dispatched as first responders to a broad range of 911 calls, from those involving minor nuisances (the vast majority of 911 calls)²⁵⁹ to those involving mental crises.²⁶⁰ And as we know, many of these police intrusions are harmful and even fatal.²⁶¹ Policing also extends into the

255. See *supra* Part II.C.

256. See *supra* Part II.C; *supra* Part II.D.

257. See *supra* Part II.C.

258. See *supra* Part II.B (outlining the racialized violence and neglect suffered by Black Pittsburghers).

259. For example, in a study of police dispatches to 911 calls in New Haven, Connecticut from 2018 to 2020, less than 4.4% of responses involved “violent” offenses. See, e.g., Thomas Breen, *95.6% Of Cops’ Calls Don’t Involve Violence*, NEW HAVEN INDEP. (June 19, 2020, 3:56 PM), https://www.newhavenindependent.org/index.php/archives/entry/police_dispatch_stats/ [<https://perma.cc/4LHS-QHSF>]. Included in the top ten most frequent police dispatches by call type (excluding the expansively defined “miscellaneous” category) are motor vehicle accidents with no injury, parking violations, noise complaints, and door or welfare checks. *Id.* Nationwide, the statistics are much lower—“violent” crime comprises about 1% of all calls for service in other major municipalities, where “[r]elatively minor incidents such as traffic responses and noncriminal miscellaneous complaints account for a much larger share of calls for service.” Asher & Horwitz, *supra* note 36.

260. See, e.g., Eric Westervelt, *Mental Health and Police Violence: How Crisis Intervention Teams Are Failing*, NPR (Sept. 18, 2020, 5:00 AM), <https://www.npr.org/2020/09/18/913229469/mental-health-and-police-violence-how-crisis-intervention-teams-are-failing> [<https://perma.cc/ER9G-JJTL>] (noting that since 2015, nearly a quarter of all the people killed by police officers in the United States have had a known mental illness and identifying growing calls to remove the role of law enforcement in responses to mental health emergencies).

261. For example, the police shot and killed twelve-year-old Tamir Rice after a 911 caller reported that a child was waving a “probably fake” gun. German Lopez, *Cleveland Just Fired the Cop Who Shot and Killed 12-Year Old Tamir Rice More than 2 Years Ago*, VOX (May 30, 2017, 1:30 PM),

provision of medical care itself: armed police and security guards have a regular presence in emergency rooms and have inflicted violence in these spaces of treatment.²⁶² Indeed, a growing number of hospitals are employing private, armed policing forces unaccountable to the public.²⁶³ And for undocumented Americans seeking urgent medical care, immigration enforcement officers have ignored their own rules²⁶⁴ regarding sanctuary to patrol and arrest vulnerable members of our communities in hospitals, hospital parking lots, and ambulances.²⁶⁵ The

<https://www.vox.com/identities/2017/5/30/15713254/cleveland-police-tamir-rice-timothy-loehmann> [<https://perma.cc/65QA-AMRA>]. The police slammed, knelt on, and killed Tanisha Anderson after responding to her family's request for help while she was experiencing a mental health crisis. Dean, *supra* note 8. The police shot and killed Atatiana Jefferson in her home after her neighbor, who saw her front door open and wanted to make sure she and her eight-year-old nephew were safe, called a non-emergency police line requesting a wellness check. P.R. Lockhart, *Fort Worth Officer Charged with Murder in Killing of Black Woman in Her Own Home*, VOX (Oct. 15, 2019, 10:29 AM), <https://www.vox.com/identities/2019/10/13/20912212/atatiana-jefferson-fort-worth-police-shooting-texas-aaron-dean-murder> [<https://perma.cc/6KKX-ZCMG>]. And the police shot and killed Gregory Hill, Jr. after neighbors called 911 with a noise complaint. Matt Stevens, *Jury Leaves \$4 to Family of Man Killed by Sheriff's Deputy, Along with Many Questions*, N.Y. TIMES (May 30, 2018), <https://www.nytimes.com/2018/05/30/us/gregory-hill-verdict-florida.html> [<https://perma.cc/5KLP-45R3>].

262. See, e.g., Jennifer Tsai, *Get Armed Police Out of Emergency Rooms*, SCI. AM. (July 14, 2020), <https://www.scientificamerican.com/article/get-armed-police-out-of-emergency-rooms/> [<https://perma.cc/J69Y-HMC3>] (outlining various incidents). See generally Ji Seon Song, *Policing the Emergency Room*, 134 HARV. L. REV. 2646 (2021) (observing that police activity in emergency rooms has largely escaped public scrutiny and arguing for a reexamination of police presence in emergency rooms). For example, in 2016, two off-duty police officers moonlighting as hospital security tased, shot, and handcuffed a twenty-six-year-old college student who was being treated for possible bipolar disorder after he danced naked and, without aggression, resisted fastening his gown. Elisabeth Rosenthal, *When the Hospital Fires the Bullet*, N.Y. TIMES (Feb. 12, 2016), <https://www.nytimes.com/2016/02/14/us/hospital-guns-mental-health.html> [<https://perma.cc/7F2C-9GLH>]. Little data on policing violence in hospitals is available because medical centers are not required to report such encounters, but there are documented instances of hospital security shooting patients, including those seeking mental health treatment. *Id.* Patients are not the only victims of police violence in hospitals—for example, in 2017, an officer physically assaulted and arrested a nurse who refused to take a blood sample without a warrant from an unconscious patient. Julia Conley, *Union Denounces 'Chilling' Assault on Nurse Defending Her Patient from Police*, COMMON DREAMS (Sept. 1, 2017), <https://www.commondreams.org/news/2017/09/01/union-denounces-chilling-assault-nurse-defending-her-patient-police> [<https://perma.cc/76Q7-PYG6>].

263. John Diedrich, Raquel Rutledge & Daphne Chen, *New Police Force in America: More Hospitals Are Creating Private Departments, Raising Concerns About Secrecy and Abuse*, MILWAUKEE J. SENTINEL (Jan. 13, 2021, 9:25 AM), <https://www.jsonline.com/in-depth/news/investigations/2020/12/15/hospital-police-have-power-officers-but-little-oversight/6362900002/> [<https://perma.cc/K8BR-ECBJ>].

264. Memorandum from John Morton, Dir., U.S. Immigr. and Customs Enf't, to Field Off. Dirs., Special Agents in Charge & Chief Couns., U.S. Immigr. and Customs Enf't (Oct. 24, 2011), <https://www.ice.gov/doclib/ero-outreach/pdf/10029.2-policy.pdf> [<https://perma.cc/UXE8-GCP3>].

265. See, e.g., Sarah Stoughton & Kathryn Hampton, *Not in My Exam Room: How U.S. Immigration Enforcement Is Obstructing Medical Care*, PHYSICIANS FOR HUM. RTS. (June 10, 2019),

abolition of police ambulance drivers has not abolished the police in these critical care settings.

But even if the impact it offered was incremental at best, the end of ambulance policing can be analyzed and even celebrated as a step towards the greater goal of abolitionist transformation and radical imagination. The recognition that ambulance policing inflicted severe and inherent harms, and the decision to eventually strip the police of their operation of emergency medical transportation and care, marked an important shift that meaningfully reduced the scale of policing. The history of Freedom House offers an example of one small but powerful way that the practice of police abolition has already benefited modern American society.

Seen in this light, Freedom House was a triumph. But its history also depicts a tragedy. Despite Freedom House's varied successes, the city of Pittsburgh chose to abandon and defund this essential program and to instead reinvest in the measurably dangerous institution of ambulance policing.²⁶⁶ Many existing narratives about the history of Freedom House fail to identify this critical fact: even after it defunded Freedom House and created a small pocket of civilian paramedics, the city maintained its system of police ambulances for many years before it finally abolished the practice.²⁶⁷

A. *From Past to Present*

In current efforts to challenge the brutality of policing, we can see echoes of the errors evident in Pittsburgh's treatment of Freedom House and ambulance policing. Three primary themes emerge that connect current failures of reform to Freedom House's history, as detailed below. First is a persisting divestment from the resources and programs, especially those with documented success, that most support communities in need. Second is a reliance on empty justifications of "public safety" to reward policing institutions with increased funding, even when these very institutions were, and remain, the principal threat to public safety compelling demands for reform. The third is police defiance: when demands for accountability are justifiably levied, the police actively—and at times, violently—resist the changes that would mitigate the harm they inflict. This Part discusses each in turn.

<https://phr.org/our-work/resources/not-in-my-exam-room/> [<https://perma.cc/2Q2X-SQ73>]; PHYSICIANS FOR HUM. RTS., ESTABLISHING SANCTUARY HOSPITALS: PROTECTING THE RIGHT TO ACCESS HEALTH CARE (2019), <https://phr.org/wp-content/uploads/2019/09/PHR-Sanctuary-Hospitals-Fact-Sheet-FINAL.pdf> [<https://perma.cc/X6EJ-J5LQ>].

266. *See supra* Part II.D.

267. *Id.*

First, consider the abandonment of Freedom House despite its documented success, both in the field and in its direct investment in the community.²⁶⁸ Freedom House was not only a medical care service—it was the sole remaining program providing job training and stability to a neighborhood suffering economic crisis,²⁶⁹ and Pittsburgh’s decision to starve Freedom House of resources before fully defunding it followed a pattern of divestment from its Black communities. This pattern of divestment unfortunately persists nationwide.²⁷⁰

Take, for example, the context in Chicago from 2012 to the present. In 2012, the city closed six mental health clinics in majority-Black neighborhoods without explanation²⁷¹ despite organized resistance from grassroots community groups like Southside Together Organizing for Power (STOP).²⁷² The following year, the city closed fifty majority-Black public schools, an unprecedented number for a major city.²⁷³ Then in 2014, after the police killing of Laquan McDonald and the delayed release of footage recording his murder, Mayor Rahm Emanuel responded to demands for police accountability with an announcement that the city

268. See *supra* Part II.D.

269. *Id.*

270. See, e.g., Ingraham, *supra* note 75 (noting that since 1980, spending on food stamps, supplemental social security payments, and temporary assistance for needy families has declined while spending on police, prisons, and the court system has “ballooned”); see also Akbar, *supra* note 23, at 1819–22 (noting various ways in which “[p]olicing and incarceration have become fundamental tools for neoliberal state management” that result in broad divestment from community needs).

271. Ben Joravsky, *Rahm Still Hasn’t Told the Public Why He Closed Mental Health Clinics*, CHI. READER (July 29, 2014), <https://www.chicagoreader.com/chicago/city-council-mental-health-clinics-closures-hearing/Content?oid=14436533> [<https://perma.cc/HH8T-KEGQ>]. Organizers warned that closing these clinics would interrupt care for vulnerable community members and would result in more untreated people becoming homeless or falling into the criminal punishment system, and evidence suggests that many of their warnings unfortunately came true. Jeff Coen, *Rahm Emanuel Closed Half of Chicago’s Mental Health Clinics. What Was the Impact—and Will Lightfoot Reopen Them?*, CHI. TRIB. (June 6, 2019, 5:00 AM), <https://www.chicagotribune.com/politics/ct-met-lori-lightfoot-chicago-mental-health-clinics-20190524-story.html> (last visited July 28, 2021).

272. Don Terry, *A Sit-In Fails to Save Clinics, but the Fight Continues*, N.Y. TIMES (Nov. 19, 2011), <https://www.nytimes.com/2011/11/20/us/sit-in-fails-to-save-chicago-mental-health-clinics.html> [<https://perma.cc/3XAN-9LRJ>].

273. Noreen S. Ahmed-Ullah, John Chase & Bob Sectar, *CPS Approves Largest School Closure in Chicago’s History*, CHI. TRIB. (May 23, 2013), <https://www.chicagotribune.com/news/ct-xpm-2013-05-23-chi-chicago-school-closings-20130522-story.html> [<https://perma.cc/Q8EK-JS38>]. A study later showed that the school closures had negative impacts on the affected students, who were primarily students of color. Valerie Strauss, *Chicago Promised that Closing Nearly 50 Schools Would Help Kids in 2013. A New Report Says It Didn’t*, WASH. POST (May 24, 2018, 3:00 AM), <https://www.washingtonpost.com/news/answer-sheet/wp/2018/05/24/chicago-promised-that-closing-nearly-50-schools-would-help-kids-in-2013-a-new-report-says-it-didnt/> [<https://perma.cc/6Q4L-RZGE>]. From 2011–2017, of the millions invested in new schools or new additions, as much as 75% has gone towards schools where white students are overrepresented. HAMAJI ET AL., *supra* note 75, at 19–20.

would build a second police training facility for an additional cost of \$95 million.²⁷⁴ At its core, this decision financially rewarded the police for its violence at a time when Chicago was already spending as much as \$4 million per day on policing.²⁷⁵ As a member of the Black, Trans, and Gender Non-Conforming Collective noted, the city refused to invest in programs like education and mental health care that “can actually cut back on the trauma, poverty and pain that often leads to violence in our communities” while it simultaneously expanded the scale of policing.²⁷⁶ The next year, in 2015, the state cut funding throughout Chicago for violence interrupter initiatives—demonstrably successful programs where people with experience navigating violence are tasked with building trust in their communities and intervening in conflicts before they intensify, without police involvement.²⁷⁷ This was on the heels of Emanuel’s 2013 refusal to renew a \$1 million contract for the program.²⁷⁸ The month after the state slashed these budgets, homicides began to increase.²⁷⁹

This pattern of divestment from Chicago’s Black communities has continued. In June 2020, at a time of persisting crisis for so many people in the city and beyond, Chicago’s budget director claimed that no federal COVID-19 relief funds would go towards policing—but it was later revealed that instead of funding essential programs and services, the city redirected \$281.5 million of its \$403 million in discretionary relief funds

274. Brandon E. Patterson, *A \$95 Million, State-of-the-Art Police Academy Is Chicago’s Latest Political Battleground*, MOTHER JONES (Dec. 1, 2017), <https://www.motherjones.com/crime-justice/2017/12/chicago-political-battleground-95-million-police-training-academy-rahm-emanuel-chance-rapper/> (last visited July 28, 2021) (observing that Emanuel has described the \$95 million academy project as “necessary” to carry out recommended reforms); John Byrne, *New Police, Fire Training Facility Set for West Side*, CHI. TRIB. (July 3, 2017, 10:42 AM), <https://www.chicagotribune.com/politics/ct-rahm-emanuel-police-fire-training-met-20170703-story.html> [<https://perma.cc/A84M-YMJS>] (observing that this proposed reform is a response to “the spotlight on the city from the Laquan McDonald police shooting”).

275. NO COP ACADEMY, #NOCOPACADEMY THE REPORT 6 (2018), <https://nocopacademy.com/wp-content/uploads/2020/06/NCAREportFinal2018.pdf> [<https://perma.cc/NR3Q-V34Y>].

276. *Id.* at 2.

277. See Ann Givens, *On Patrol with Chicago’s Last Violence Interrupters*, THE TRACE (Feb. 6, 2017), <https://www.thetrace.org/2017/02/chicago-homicides-cure-violence-interrupters/> [<https://perma.cc/Z2GH-CZW3>].

278. *Id.*; see also Tribune Wire Reports, *Anti-Violence Programs Shut Down as Chicago Shootings Climb*, L.A. TIMES (Oct. 9, 2015, 12:08 PM), <https://www.latimes.com/nation/ct-ceasefire-funds-frozen-as-chicago-shootings-climb-20151009-story.html> (last visited July 28, 2021).

279. Experts note that it is difficult to assess a direct correlation between the funding cuts to the violence interrupter program and increasing violence, but data does demonstrate that in April 2015, one month after state funding to this program was “slashed,” homicides began to increase. Givens, *supra* note 277.

to the police.²⁸⁰

Chicago, like Pittsburgh, decided to divest from the programs known to measurably improve the lives of its most policed communities. These decisions echo throughout history in patterns of divestment from public schools, public health and mental health care, and other critical services, especially for communities of color.²⁸¹ Even where abolitionist projects like Freedom House or violence interrupter programs²⁸² have proven effective, governments choose to starve or abandon these efforts despite their success. Such actions defy logic.

Against this historical backdrop, abolitionist demands for community (re)investments are especially urgent. It is notable that Freedom House demanded more than the mere absence of the police—it invested in the Hill District’s own residents and built expertise and leadership within Pittsburgh’s Black communities.²⁸³ It worked to transfer resources and power directly to the community, rather than to state or city programs serving the community. This type of reallocation can be truly transformative, leading abolitionist organizers today to demand investments in community-led and community-controlled solutions rather than solely focusing on state-operated programs.²⁸⁴ The history of

280. Trone Dowd, *Chicago’s Mayor Gave More than \$280 Million in COVID Relief Money to the Cops*, VICE NEWS (Feb. 18, 2021, 11:05 AM), <https://www.vice.com/en/article/wx8a8m/chicago-mayor-lori-lightfoot-gave-millions-covid-relief-police> [<https://perma.cc/2DU4-LXQZ>].

281. See, e.g., Daarel Burnette II, *Schools or Police: In Some Cities, a Reckoning on Spending Priorities*, EDUC. WEEK (June 18, 2020), <https://www.edweek.org/leadership/schools-or-police-in-some-cities-a-reckoning-on-spending-priorities/2020/06> [<https://perma.cc/4QXV-SEFL>] (discussing the history of divestment from majority-Black school districts as well as the growing calls, following the police killing of George Floyd, to reroute funds from policing budgets towards education and youth services); Joseph P. Williams, *Code Red: The Grim State of Urban Hospitals*, U.S. NEWS (July 10, 2019, 11:23 AM), <https://www.usnews.com/news/healthiest-communities/articles/2019-07-10/poor-minorities-bear-the-brunt-as-urban-hospitals-close> (last visited July 28, 2021) (discussing the disparate impact of urban hospital closures, which occur at a higher frequency in Black or racially segregated communities); Liz Kowalczyk, *Color Line Persists, in Sickness As in Health*, BOS. GLOBE (Dec. 12, 2017), <https://apps.bostonglobe.com/spotlight/boston-racism-image-reality/series/hospitals/> [<https://perma.cc/FH3B-WJCN>] (discussing the racial segregation patterns that are “deeply imbedded” in Boston’s healthcare infrastructure); Gillian B. White, *The Data Are Daming: How Race Influences School Funding*, ATLANTIC (Sept. 30, 2015), <https://www.theatlantic.com/business/archive/2015/09/public-school-funding-and-the-role-of-race/408085/> [<https://perma.cc/9CMU-G9S2>] (discussing the chronic underfunding suffered by majority-minority schools and explaining that school districts with a higher proportion of white students receive substantially higher funding than districts with more minority students).

282. I refer only to those violence interrupter programs that do not collaborate with or directly involve the police as abolitionist projects.

283. See *supra* Part II.C.

284. For example, the demands of Organizing Black, a Baltimore-based and member-led organization fighting for Black liberation, include the creation of a community wellness trust fund and investments into Black communities. Organizing Black (@OrganizingBlack), TWITTER (Apr. 20,

Freedom House affirms the strength of this approach, and it underscores the destructive consequences of divesting from community-directed solutions.

Such patterns of divestment often run parallel to a reinvestment in policing. The second theme of failed reform identified above is a reliance on empty justifications of “public safety” to uphold continued support of known harms of policing. In Pittsburgh, the discriminatory and irresponsible practices of police ambulance drivers were well-documented, but the police and city officials alike continued to insist that emergency medical transportation should remain a “public safety” function under police control.²⁸⁵ A true allegiance to public safety would have prioritized the health of Pittsburghers over a desire to maintain the funding, powers, and employment of the police. Instead, the police and city officials insisted that funneling more resources into the police department would correct the harms inflicted by its practices.²⁸⁶ Following the advent of modern civilian ambulances, we can now fully appreciate the danger and impracticality of the police’s self-aggrandizement. And thanks to the resistance organizing of Hill residents and their supporters, it became clear that the “public safety” justification was a fiction when the city eventually removed this power from the police.

The history of Freedom House affirms the need to continue resisting empty justifications of “public safety,” which—as evidenced by this history—can maintain or expand the scale of policing without empirical support. Abolitionist organizers have long challenged the “public safety” justifications that purportedly require policing forces to, among other forms of violence, surveil and discipline children in schools,²⁸⁷ attack people experiencing mental health crises,²⁸⁸ persecute people of color for

2021, 7:08 AM), <https://twitter.com/OrganizingBlack/status/1384509313901813763> [<https://perma.cc/VP32-S77B>]. Similarly, the Durham Beyond Policing Coalition demanded the creation of a community-led safety and wellness task force (explicitly excluding law enforcement officers and prioritizing those directly impacted by systemic violence) that would have the power to propose and implement solutions to police violence and harm. DURHAM BEYOND POLICING COAL., PROPOSAL FOR A COMMUNITY-LED SAFETY AND WELLNESS TASK FORCE 7 (2019), <https://durhambeyondpolicing.org/wp-content/uploads/2019/07/Durham-Beyond-Policing-Budget-Proposal-2019-2020.pdf> [<https://perma.cc/WTW4-8B5V>].

285. *See supra* sections II.A–.B, .D.

286. *See supra* section II.D.

287. *See, e.g.*, ADVANCEMENT PROJECT, WE CAME TO LEARN: A CALL TO ACTION FOR POLICE-FREE SCHOOLS 12, 22–23 (2019), <https://advancementproject.org/wp-content/uploads/WCTLweb/index.html#page=1> [<https://perma.cc/X522-KVS5>] (explaining how increasing police presence in schools will not make students safer and, in fact, jeopardize healthy learning climates and place students of color in danger).

288. *See, e.g.*, Tracey Ross, *The Abolitionist Project: Building Alternatives to Policing*, ESSENCE

minor traffic violations,²⁸⁹ or harass homeless communities.²⁹⁰ Where the institution of policing is itself a danger to public safety, its persistent urging that such concerns demand increased investment should be disregarded.

Unfortunately, we continue to see governments reinvesting in the police under a guise of improved public safety without meaningful critique. For example, after the police killing of Breonna Taylor, the city of Louisville refused community demands to redistribute funds from the police into needed social investments and instead increased the police budget.²⁹¹ Following the 2020 uprisings, then-presumptive Democratic nominee Joe Biden also rejected the growing calls to abolish and defund

(June 18, 2020), <https://www.essence.com/essence-policylink/the-abolitionist-project-building-alternatives-to-policing/> [<https://perma.cc/BRF7-3Z7E>] (discussing the Anti Police-Terror Project, a community coalition in Northern California working to build models to end police violence and support impacted families, that created Mental Health First, a mobile mental health crisis response team that offers a non-punitive, patient-centered alternative to police responses, at a time when at least one in four people who were shot and killed by the police suffered from an acute mental illness at the time).

289. See, e.g., Meg O'Connor, *What Traffic Enforcement Without Police Could Look Like*, APPEAL (Jan. 13, 2021), <https://theappeal.org/traffic-enforcement-without-police/> [<https://perma.cc/UK64-TBYY>] (noting that 11% of all fatal police shootings in 2015 occurred during traffic stops and identifying efforts to remove police presence from traffic enforcement). See generally Jordan Blair Woods, *Traffic Without the Police*, 73 STAN. L. REV. 1471 (2021) (articulating a new legal framework that decouples traffic enforcement from police functions).

290. See, e.g., Gwynne Hogan, *For New Yorkers Who Need Food and Shelter, "Abolition Park's" Police-Free Zone Feels Like Home*, GOTHAMIST (July 8, 2020, 6:00 AM), <https://gothamist.com/news/for-new-yorkers-who-need-food-and-shelter-abolition-parks-police-free-zone-feels-like-home> [<https://perma.cc/DH2B-H2LA>] (identifying an effort by organizers and people experiencing homelessness to occupy a plaza renamed Abolition Park, while providing care for those who need it, to support demands to defund the police).

291. See Aviva Shen, *Defund the Louisville Police by \$12 Million*, SLATE (Sept. 16, 2020, 3:41 PM), <https://slate.com/news-and-politics/2020/09/breonna-taylor-settlement-police-taxpayers.html> [<https://perma.cc/BS32-R6HM>] (observing that in June 2020, after community demands to defund the police, the Louisville metro government increased the police budget from \$189.8 million to \$190.5 million). A Black-led collective of community organizations and individuals initially asked the city to divest \$100 million from the police to invest in other forms of community safety systems, such as conflict resolution facilitators, economic and housing development, and local food systems in underserved areas. Danielle Grady, *Protesters Demanded Defunding the Police, Mayor, City Council Said: No*, LEO WKLY. (July 1, 2020), <https://www.leoweekly.com/2020/07/protesters-demanded-defunding-police-mayor-city-council-said-no/> [<https://perma.cc/8DXD-JDYA>]. Another coalition of Louisville nonprofits, members of historically Black fraternities and sororities, and religious leaders petitioned for an "immediate reduction and reallocation" of the police budget to invest "in the appropriate first responders" as well as a \$50 million Black Community Fund to support housing, education, and mental health treatment. *Id.* Councilman Brandon Coan also presented a plan to cut the police budget by 15% over three years and reallocate those funds to investments in Louisville's Black communities. *Id.* Instead of making any effort towards divestment, the Metro Council increased its contributions to the police budget by \$750,200. *Id.*

the police²⁹² and instead proposed an additional \$300 million in federal funds to support what he called “real reforms”: “reinvigorat[ing] community policing,” purchasing more body cameras, and hiring “more diverse police officers.”²⁹³ He has maintained this position even after his inauguration.²⁹⁴ As with the proposed reforms to “improve” ambulance policing with more training and more expensive vehicles, studies demonstrate that the reforms cited by Biden have largely failed to reduce police violence.²⁹⁵ And yet Biden, like other advocates of such reforms, continues to insist on expanding policing budgets and power while resisting the abolitionist demands that would concretely reduce violent confrontations with police.

The decision to reinvest in policing is especially puzzling given police defiance to necessary change, the third theme identified above. Despite

292. For example, following the police murders of George Floyd and Breonna Taylor in 2020, abolitionist organizers created a template of eight abolitionist reforms that would equip communities to provide for their own safety and wellbeing without reliance on policing or the prison industrial complex. These reforms included defunding the police, demilitarizing communities, removing police from schools, freeing people from jails and prisons, repealing laws that criminalize survival, investing in community self-governance, providing safe housing for everyone, and investing in care. See #8TOABOLITION, 8toabolition.com [https://perma.cc/W9C6-78W9].

293. Joe Biden, *Biden: We Must Urgently Root out Systemic Racism, from Policing to Housing to Opportunity*, USA TODAY (June 11, 2020, 11:17 AM), <https://www.usatoday.com/story/opinion/2020/06/10/biden-root-out-systemic-racism-not-just-divisive-trump-talk-column/5327631002/> [https://perma.cc/LT5H-HQAR].

294. See Reuters Staff, *Biden Suggests More Police Funding, No Jail for Drug Offenders*, REUTERS (Feb. 16, 2021, 8:38 PM), <https://www.reuters.com/article/us-usa-biden-police/biden-suggests-more-police-funding-no-jail-for-drug-offenders-idUSKBN2AH0C6> [https://perma.cc/QLT9-YJEJ].

295. See, e.g., Louise Matsakis, *Body Cameras Haven't Stopped Police Brutality. Here's Why*, WIRED (June 17, 2020, 12:41 PM), <https://www.wired.com/story/body-cameras-stopped-police-brutality-george-floyd/> [https://perma.cc/5YBV-EVTS] (discussing how body cameras—a reform largely instituted in the aftermath of the police killing of Michael Brown—have “failed to prevent more police violence”); Rhea Mahbubani, *Officers Already Get Training to Deal with Biases They May Not Know They Have, but There's No Evidence It Actually Works*, INSIDER (June 16, 2020, 9:04 AM), <https://www.insider.com/police-defensive-deescalation-techniques-implicit-bias-training-2020-6> [https://perma.cc/JFT6-ZGVX] (discussing the evidence demonstrating that implicit-bias training for police officers is ineffective); Maya Schenwar & Victoria Law, *The Problem with “Community Policing”*, SLATE (July 30, 2020, 12:10 PM), <https://slate.com/news-and-politics/2020/07/prison-by-any-other-name-book-excerpt.html> [https://perma.cc/N6UU-JTXJ] (discussing the dangers of community policing); Terrell Jermaine Starr, *Community Policing Is Not the Solution to Police Brutality. It Makes It Worse.*, WASH. POST (Nov. 3, 2015, 6:30 AM), <https://www.washingtonpost.com/posteverything/wp/2015/11/03/community-policing-is-not-the-solution-to-police-brutality-it-makes-it-worse/> [https://perma.cc/E7YW-4NY8] (explaining why community policing is not the solution to police brutality); MPD150, ON COMMUNITY POLICING: WHOSE COMMUNITY? 1 (2019), <https://www.mpd150.com/wp-content/uploads/2019/08/Community-Policing-Blog-Post-1.pdf> [https://perma.cc/8U29-9QEA] (describing the dangers of community policing); Janelle Bouie, *Black and Blue*, SLATE (Oct. 13, 2014, 7:12 PM), <https://slate.com/news-and-politics/2014/10/diversity-wont-solve-police-misconduct-black-cops-dont-reduce-violence-against-black-citizens.html> [https://perma.cc/92RA-JU2H] (discussing why diversifying police departments will not put an end to police misconduct).

the objectively superior care offered by Freedom House, the police believed it was entitled to retain control over the city's ambulances, that these jobs "belonged" to them.²⁹⁶ They therefore attempted to sabotage Freedom House's growth, even going so far as to threaten arrest of Freedom House paramedics seeking to properly treat injured patients on the street.²⁹⁷ Once the city created a small service of civilian paramedics, the police also obstructed their efforts to deliver superior medical care.²⁹⁸

One need look no further than the most recent era of protests to observe the persisting scale and violence of police defiance. When confronted with a groundswell of public outcry in 2020 over the police killings of community members of color, the police rioted and chose violence over accountability.²⁹⁹ Officers retaliated against members of the press for publicizing the brutality of their actions,³⁰⁰ against legal observers for monitoring their violence,³⁰¹ and against street medics for assisting protestors.³⁰² And even when they could not hide from reporters' cameras, even when they knew that their actions were being documented, the police beat, fired "less-lethal" munitions, and fatally shot community members

296. See *supra* sections II.C–D.

297. See *supra* section II.C.

298. See *supra* section II.D.

299. See Janelle Bouie, *The Police Are Rioting. We Need to Talk About It*, N.Y. TIMES (June 5, 2020), <https://www.nytimes.com/2020/06/05/opinion/sunday/police-riots.html> [<https://perma.cc/TZ2B-G25Y>].

300. Michael Safi, Caelainn Barr, Niamh McIntyre, Pamela Duncan & Sam Cutler, *I'm Getting Shot: Attacks on Journalists Surge in US Protests*, GUARDIAN (June 5, 2020, 8:03 AM), <https://www.theguardian.com/media/2020/jun/05/im-getting-shot-attacks-on-journalists-surge-in-us-protests> [<https://perma.cc/268G-X286>].

301. Steve Neavling, *Detroit Police Accused of 'Severely' Beating a Legal Observer, Pepper-Spraying 2 Others at Protest*, DETROIT METRO TIMES (Aug. 25, 2020, 11:44 AM), <https://www.metrotimes.com/news-hits/archives/2020/08/25/detroit-police-accused-of-severely-beating-a-legal-observer-pepper-spraying-2-others-at-protest> [<https://perma.cc/KE7Q-7GB9>]; Dan Quart, *The NYPD Is Undermining Our Ability to Hold Them Accountable. The Mayor Must Act*, GOTHAM GAZETTE (Oct. 19, 2020), <https://www.gothamgazette.com/opinion/9838-nypd-undermining-accountability-mayor-must-act-human-rights-watch> [<https://perma.cc/LQZ9-ZQLL>]; Deedee Sun, *National Lawyers Guild Again Accuses SPD of Targeting and Assaulting Legal Observers*, KIRO 7 (Aug. 18, 2020, 3:36 PM), <https://www.kiro7.com/news/local/national-lawyers-guild-again-accuses-spd-targeting-assaulting-legal-observers/AQJKEQXRJBBXBLMIBHFILJNKHA/> [<https://perma.cc/6TMV-LEPW>].

302. The police have intentionally destroyed medical equipment, refused to allow street medics into demonstrations, and threatened street medics with arrest if they try. The police have even inflicted violence on street medics and critically injured patients who seek urgent medical attention. Jonathan Pedneault, *Police Targeting 'Street Medics' at US Protests*, HUM. RTS. WATCH (June 17, 2020, 4:32 PM), <https://www.hrw.org/news/2020/06/17/police-targeting-street-medics-us-protests#> [<https://perma.cc/R6E9-GSAY>]; Mackensy Lunsford & Casey Blake, *Asheville Police Chief Zack Apologizes for Medic Tent Destruction, 'Trauma' to Volunteers*, ASHEVILLE CITIZEN TIMES (June 5, 2020, 9:07 AM), <https://www.citizen-times.com/story/news/local/2020/06/04/asheville-police-chief-zack-apologizes-medic-tent-destruction/3148766001/> [<https://perma.cc/X2RW-4KU7>].

for having the audacity to ask for accountability.³⁰³

In fact, when steps were taken to hold officers accountable for their violence, their colleagues took action in solidarity with their brutality. Police officers resigned from their department's emergency response team to protest the suspension of two colleagues for severely injuring an elderly protestor;³⁰⁴ threatened work slowdowns when a colleague was belatedly fired for killing Eric Garner;³⁰⁵ organized a sick-out to protest criminal charges levied against colleagues for killing Rayshard Brooks;³⁰⁶ and even sold t-shirts celebrating a colleague's violence after he was reprimanded for clubbing a student protestor with a baton.³⁰⁷

These brutal displays of defiance demonstrate a systemic unwillingness to recognize a need for change. And like the Pittsburgh police in the late 1960s, this resistance to reform reflects a deeper issue within the institution of policing: violent entitlement. The police in Pittsburgh acted as if the role of emergency medical transporters belonged to them, no matter how dangerous their practices. The police today act as if the role of the "warrior cop"³⁰⁸ belongs to them, no matter how deadly their practices. Now, as it did then, the institution of policing refuses to hold

303. See Tobi Thomas, Adam Gabbatt & Caelainn Barr, *Nearly 1,000 Instances of Police Brutality Recorded in US Anti-Racism Protests*, GUARDIAN (Oct. 29, 2020, 11:00 AM), <https://www.theguardian.com/us-news/2020/oct/29/us-police-brutality-protest> [<https://perma.cc/GTS6-SKEG>]; Shaila Dewan & Mike Baker, *Facing Protests over Use of Force, Police Respond with More Force*, N.Y. TIMES (June 2, 2020), <https://www.nytimes.com/2020/05/31/us/police-tactics-floyd-protests.html> [<https://perma.cc/TZRN-E4L7>]; Ray Sanchez & Evan McMorris-Santoro, *Louisville BBQ Man Who Was Fatally Shot When Police Dispersed Crowd Used to Feed Officers for Free*, CNN (June 3, 2020, 11:16 AM), <https://www.cnn.com/2020/06/02/us/david-mcatee-louisville-what-we-know-trnd/index.html> [<https://perma.cc/MTV3-LQL4>].

304. Neil Vigdor, Daniel Victor & Christine Hauser, *Buffalo Police Officers Suspended After Shoving 75-Year-Old Protestor*, N.Y. TIMES (Feb. 23, 2021), <https://www.nytimes.com/2020/06/05/us/buffalo-police-shove-protester-unrest.html> [<https://perma.cc/X8B7-4C7E>]. Their unpaid suspension lasted only thirty days—they are now suspended with pay. Aaron Besecker, *Buffalo Cops Charged with Shoving Protestor Remain Suspended, but Now with Pay*, BUFFALO NEWS (Mar. 22, 2021), <https://buffalonews.com/news/local/buffalo-cops-charged-with-shoving-protester-remain-suspended-but-now-with-pay/> [<https://perma.cc/8ZB3-2FWU>].

305. Jake Offenhartz & George Joseph, *'The Job Is Dead': NYPD Officers Seethe in Wake of Pantaleo Firing*, GOTHAMIST (Aug. 22, 2019, 8:58 PM), <https://gothamist.com/news/the-job-is-dead-nypd-officers-seethe-in-wake-of-pantaleo-firing> [<https://perma.cc/2QE5-4QS5>].

306. Katie Shepherd, *Atlanta Police Call in Sick to Protest Murder Charge Against Officer Who Shot Rayshard Brooks*, WASH. POST (June 18, 2020, 5:49 AM), <https://www.washingtonpost.com/nation/2020/06/18/atlanta-rayshard-brooks-walkout/> [<https://perma.cc/N44C-J9GS>].

307. Michael Tanenbaum, *Philly FOP Members Applaud Inspector Joseph Bologna as He Surrenders on Assault Charges*, PHILLY VOICE (June 8, 2020), <https://www.phillyvoice.com/philly-police-fop-joesph-bologna-charged-mcnesby-shirts-temple-student-protest/> [<https://perma.cc/ZE5C-GYEH>].

308. See Radley Balko, *Rise of the Warrior Cop*, WALL ST. J. (Aug. 7, 2013, 4:44 PM), <https://www.wsj.com/articles/SB10001424127887323848804578608040780519904> [<https://perma.cc/YHL5-Z9PF>].

itself accountable for demonstrated patterns of harm. It has placed its own self-interest over any true allegiance to public safety, and when it has felt threatened, it has attacked rather than engaged in self-reflection. Abolitionist organizers have repeatedly urged that reforms sustaining or expanding the institution of policing are therefore bound to fail.³⁰⁹ The history of Freedom House provides one such cautionary tale.

But the work of Freedom House paramedics also offers a path forward. Their history demonstrates the pragmatism and viability of abolition. It shares a story of subverting police interference, of building a community-driven system of care where the people were no longer harmed or abandoned by a critical aspect of policing. They understood that the objects of transformation were not only the police, but the society surrounding them—they envisioned and then created a world where police violence receded and in its place, they were provided the space and resources to have what policing had for so long withheld: the chance to heal.

CONCLUSION

Decades after the eradication of “paddy wagon” ambulances in Pittsburgh, the people continue to mobilize against the violence of policing. In the summer of 2020, protests swelled in Pittsburgh as they did nationwide. Crowds in Pittsburgh reportedly chanted: “They don’t lynch us in the trees, they kill our babies in the street.”³¹⁰

There is, of course, much more work to be done. But the lifesaving efforts of Freedom House paramedics helped galvanize a new era of civilian paramedics that, in an incremental but meaningful way, reduced the scale of policing in Pittsburgh and beyond. Fundamentally, the history of Freedom House emphasizes the enduring need for transformative imagination. Although the call to abolish ambulance policing was initially dismissed as unrealistic, it eventually reduced the footprint of policing and transformed our modern understanding of emergency medical care. What abolitionist demands are ignored today as too radical but can, in the near future, be universally essential to our understanding of community care and safety?

The legacy of Freedom House serves as a powerful reminder that the practice of abolition is already rooted in American history. From these seeds germinating throughout history, the practice of abolition will only continue to grow.

309. *See supra* Part I.

310. Hailer, *supra* note 127.