



Homeland
Security

EXECUTIVE SUMMARY AND DECISION

HOLSTER STUDY SYNOPSIS

As a result of four separate incidentsⁱ related to auto-lock, trigger finger manipulation holsters [Blackhawk SERPA CQC Level II holstersⁱⁱ (low wall)], the Federal Law Enforcement Training Center (FLETC) requested that a study be conducted to identify any common causative factors unique to this holster design. The study was assigned to Firearms Division (FAD) at FLETC-Glynco with assistance from the FLETC Field Training Directorate (FTD). A subsequent companion study of the Blackhawk SERPA CQC Level II Holster (high wall) was also conducted which resulted in similar findings.

The scope of both holster studies was devised to identify any safety related problems unique to the deactivation of the retention device while drawing and presenting the firearm. This testing included the following components: a review of the current FAD curriculum; review of FAD Standard Operating Procedures (SOPs); an interview of the student involved in the FLETC-Glynco accident; a search to identify and verify other outside incidents within the firearms training community; and psycho-motor skills testingⁱⁱⁱ of the process of drawing a weapon from the auto-lock trigger finger manipulation holster. The participants completed written feedback critiques at the conclusion of their session. Also, there was limited video recording of certain portions of the testing.

SUMMARY OF FINDINGS

The conclusions and results gathered from the analysis of holster testing and participant feedback was captured in separate reports at the completion of both the studies.

- Duress is experienced by the shooter when draw-stroke steps are executed out of order. This *sequencing error* can then initiate a *cascading series of failures*^{iv}. This series of failures is first recognized by the shooter as an inability to draw the firearm from the holster.
 - This inability is caused by:
 - The tension caused by the upward pressure of the draw stroke occurring prior to the deactivation of the retention mechanism.
 - Unless deactivated prior to the draw action, this feature “locks” the pistol in the holster. Once locked, the shooter experiences a greater amount of *duress*.
 - The shooter then tends to use more force in an effort to remove the weapon from the holster and tends to transition from *digital-pad* to *digital-tip* pressure which causes the trigger finger to bend. Also, the associated increase in grip pressure causes *all* of the fingers of the strong hand to flex, further increasing the flex or bend of the trigger finger.
 - When the firearm is finally removed from the holster, this bend in the trigger finger positions the finger proximal to the trigger or on the trigger.
- The feedback from the majority of the FAD staff^v that participated in the study indicates that a holster that requires multi-tasking of the trigger finger or that has a release mechanism closely

proximal to the trigger is potentially problematic by increasing the risk of an inadvertent discharge. Subsequent review of the studies by the FLETC FTD SMEs also concluded that proximity of the finger to the trigger creates an inherent safety risk.

- The proctors that administered the testing are all SMEs^{vi} from the FLETC Basic and/or Advanced Firearm Training Programs and. The recommendation provided by these SMEs regarding the use of this style holster range from *“hesitant to recommend the use of”* to *“should not be used in training.”*
- The frame by frame review of the video from the intern/CITP student portion of the psychomotor skills testing indicates that during approximately 25% of the draw strokes the shooter’s trigger finger was proximal to the trigger and approximately 13% of the draw strokes began out of sequence (low wall study).
- The interview with the CITP student involved in the training accident on December 13, 2011, revealed that the curriculum and presentation of that curriculum was appropriate and complete. The student indicated that he experienced a sequencing error and discharged his weapon.
- An informal survey was conducted of commercial and private firearms training facilities. Several responses included; *this style of holsters can be used but must have the release mechanism disabled, or cannot be used at a facility.*

DECISION

Based upon the known facts, SME observations and both holster study findings, the FLETC submits the following training decision:

- The FLETC is restricting the use of level II retention, auto lock-trigger finger release style holsters during *all* firearms training on FLETC firearms ranges. Holsters that possess a single retention release mechanism that is located proximal to the trigger area of the firearm are problematic and pose a safety hazard. Holsters that include additional release mechanisms (level III retention) should be evaluated for suitability prior to use on FLETC firearms ranges. This restriction will be classified as a “local range rule” which the FLETC has used in the past to improve safety practices during firearms training at all FLETC training sites.

(b) (6)

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Connie L. Patrick, Director
Federal Law Enforcement Training Center

ⁱ The first incident, an Unintentional Discharge (UD), occurred on July 20, 2010, at FLETC-Glynco. This incident was the result of the shooter’s jacket becoming entangled in the holster during the process of re-holstering the pistol. The three most recent incidents were apparent Negligent Discharges (ND) and occurred on October 27, 2011, at FLETC-Cheltenham, on December 13, 2011, at FLETC-Glynco and on March 30, 2012, at FLETC-Cheltenham. All of these ND’s resulted in self-inflicted injuries.

ⁱⁱ The Auto-Lock Trigger Finger Manipulation Holster has been available commercially since 2006. It is available for most models of pistols and revolvers. This holster is available in both left and right hand models. As a retention holster, this design protects and retains the firearm as designed. The holster is designed with an auto-lock system that securely holds and “locks” the

firearm in the holster when the firearm is inserted. There is no need to manipulate any portion of the holster to secure the firearm. The release for the retention mechanism is located on the exterior of the holster on the outboard side, in the area of the trigger/trigger guard of the firearm. To operate the release the shooter establishes his/her strong-hand grip, extending and straightening the index finger (trigger finger). The shooter then applies *digital-pad* pressure with the trigger finger to the “release button”. This action deactivates the retention device allowing the shooter to draw and present the firearm.

ⁱⁱⁱ This testing consisted of a series of draw stroke drills that commenced with 4 second facings and were reduced incrementally to .75 seconds. These skills were conducted both strong-hand (two-hand) and support-hand (one-hand).

^{iv} A cascading series of failures is best described as non-sequenced, repetitive actions that place the shooter in danger of experiencing a Negligent Discharge.

^v This group consisted of 49 FAD instructional staff members (FLETC staff and Partner Organization (PO) representatives) with approximately 294 years of instructional experience.

^{vi} These SMEs possess 120 years of active firearms training experience. They are the Lead Instructors with program oversight for the following programs: CITP, UPTP, LMPT, RSITP, SSTP, LERTP and FITP.

12-1588-A

Federal Law Enforcement Training Center
U. S. Department of Homeland Security
1131 Chapel Crossing Road
Glynco, Georgia 31524

GTD 581
4/11

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(b) (6)

8/1/12



Homeland Security

June 18, 2012

115-500 (GTD/FAD)

ACTION

(b) (6)
(b) (6)

7/2/12

MEMORANDUM FOR:

Connie L. Patrick
Director

(b) (6)
(b) (6)

8/1/12

THROUGH:

D. Kenneth Keene
Deputy Director

(b) (6)
(b) (6)

David H. Brunjes
Chief Counsel
Office of Chief Counsel

7/11/12

Joseph W. Wright
Assistant Director
Field Training Directorate

(b) (6)
(b) (6)

6/27/12

FROM:

Dominick D. Braccicini
Assistant Director
Glynco Training Directorate

(b) (6)
(b) (6)

6/22/12

SUBJECT:

Holster Study: Auto-Lock, Trigger Finger Manipulation Holsters

Purpose

As a result of four separate incidents related to auto-lock trigger finger manipulation holsters [Blackhawk SERPA CQC Level II Holster (low wall)] on Federal Law Enforcement Training Center (FLETC), Firearms Training Ranges, a study was ordered to determine if a restriction should be imposed on the use of this holster or to allow the continued use of this holster design with an accompanying advisory warning to the Partner Organizations (PO).¹ A subsequent companion study of the Blackhawk SERPA CQC Level II Holster (high wall) was also conducted which resulted in similar findings.

Background

It should be noted that the first incident, an Unintentional Discharge (UD), occurred on

¹ On November 30, 2006 a student-induced negligent discharge resulted in a self-inflicted gunshot wound. A Safariland model #518 thumb-break holster was used and was not included in this study.

July 20, 2010 at FLETC-Glynco during the re-holstering of a pistol. This particular discharge was partially attributed to loose clothing (jacket) interfering with the re-holstering process. The student only suffered minor powder burns. The three most recent incidents were apparent Negligent Discharges (ND) and occurred on October 27, 2011, at FLETC-Cheltenham, on December 13, 2011, at FLETC-Glynco and on March 30, 2012, at FLETC-Cheltenham. All of these ND's resulted in self-inflicted injuries.

The Glynco Training Directorate (GTD), Firearms Division (FAD) organized a working group to establish testing protocol in an effort to determine the appropriate type and level of study that should be conducted. This working group included subject matter experts (SMEs) from the FAD, as well as, the Field Training Directorate (FTD) and the Training Innovation and Management Directorate (TIM), Training Innovation Division (TID), Training Research Branch (TRB). After discussion, a Level I Study was identified which consisted of the validation of known information, testing of specific skills, participant evaluation and the reporting of conclusions. The Level I study included the following components: a review of the current FAD curriculum; review of FAD Standard Operating Procedures (SOPs); an interview of the student involved in the December 13, 2011, FLETC-Glynco accident; a search to identify and verify other incidents within the firearms training community; and psycho-motor skills testing of the process of drawing a weapon from auto-lock trigger finger manipulation holsters. The skills testing included participant feedback and limited video recording of portions of the testing.

Discussion

The auto-lock trigger finger manipulation holster has been available commercially since 2006. It is available in differing configurations for most models of pistols and revolvers. This holster is available in both left and right hand models. As a retention holster, this design protects and retains the firearm very well. The holster is designed with an auto-lock system that securely holds and "locks" the firearm in the holster when the firearm is inserted. There is no need to manipulate any portion of the holster to secure the firearm.

The release for the retention mechanism is located on the exterior of the holster on the outboard side, in the area of the trigger/trigger guard of the firearm. To operate the release the shooter establishes his/her strong-hand grip, extending and straightening the index finger (trigger finger). The shooter then applies *digital-pad* pressure with the trigger finger to the "release button." This action deactivates the retention device allowing the shooter to draw and present the firearm.

The scope of the holster testing was devised to identify any safety related problems unique to the deactivation of the retention device while drawing and presenting the firearm. The testing process included subjects from the FLETC Intern Program and as volunteers they possess little or no firearms experience; several Criminal Investigator Training Program (CITP) students nearing graduation (post qualification); and FAD instructional staff members [FLETC staff and Partner Organization (PO) representatives].

The intern testing process included a short lecture, demonstration and familiarization session with several types of holsters. The holsters used during the intern portion of the testing were the FLETC issued leather thumb-break holster; a FLETC issued Safariland ALS with a thumb

release bail and the auto-lock trigger finger manipulation holsters that requires *digital-pad* pressure to deactivate the retention mechanism. The CITP participation was limited to two student volunteers. Those students also received a short lecture and familiarization session regarding the proper use of the auto-lock trigger finger manipulation holsters and the proper manner in which the retention mechanism is deactivated. The FAD staff received the same lecture and familiarization session. All participants completed a written evaluation of the holster at the conclusion of their session.

After the familiarization session, the testing consisted of a series of draw stroke drills that commenced with four second facings and were reduced incrementally to .75 seconds. These skills were conducted with both strong-hand (two-hand) and support-hand (one-hand) draws.

The intern and CITP student sessions were videotaped in an attempt to review any trigger finger management failures. The video was not completely clear due to the speed of the draw stroke in real-time and the shutter limitations of the cameras. However, a frame by frame review of the video did allow test proctors to identify instances when the trigger finger was *prematurely proximal* to the trigger or trigger guard during the presentation of the firearm.

Forty-nine FAD staff instructors participated in the same testing process and completed feedback forms upon completion of the testing. Those sessions were not video recorded.

Through the testing and review process, several interesting points were identified regarding this type or style holster. An efficient draw and presentation of the firearm from this type of holster is contingent upon the proper sequencing of the required steps. To use this type of holster the shooter must establish his/her grip, apply slight *downward pressure*, release the retaining mechanism by applying *digital-pad* pressure with the trigger finger followed by completing the draw stroke.

Duress is experienced by the shooter when those steps are executed out of order. This *sequencing error* can then initiate a *cascading series of failures*. This series of failures is first recognized by the shooter as an inability to draw the firearm from the holster. This inability is caused by the tension of the upward pressure of the draw occurring prior to the retention mechanism release button activation. Unless deactivated prior to the draw action, this feature "locks" the pistol in the holster. Once locked, the shooter experiences a greater amount of duress. As a result, the shooter then tends to use more force in an effort to remove the weapon while applying a more direct *digital-tip* pressure on the release button. Based upon the perceived need to draw the firearm, this cycle or series repeats itself, further complicating the draw until the weapon is finally removed from the holster.

By transitioning from *pad* pressure to *tip* pressure, the trigger finger flexes or bends. Also, the associated increase in grip pressure causes *all* of the fingers of the strong hand to flex, further increasing the flex or bend of the trigger finger. When the firearm is finally removed from the holster, this bend in the trigger finger positions the trigger finger for contact with the trigger or hovering near the trigger. This factor, in conjunction with the shooter's perceived need to quickly complete the draw and engage his or her target, creates a situation that can and has included negligent discharges.

The transition from pad pressure to tip pressure may be the result of fine motor skills versus gross motor skills. Though the release button is appropriately sized, and should be manipulated with the pad of the trigger finger, it was noted that when experiencing duress due to a sequencing error, students tend to shift to the tip of the finger. This shift tends to indicate that due to years of pressing buttons on electronics, appliances etc., people tend to shift to what they intuitively know will work. The use of the tip of the finger is a fine motor skill. Other more conventional style holsters require that the thumb apply some sort of pressure with the pad of the thumb or the thumb as a rigid lever to deactivate a snap, bail or release. This is more of a gross motor skill that requires less precision and is often incorporated in the act of establishing the shooting grip.

FLETC students participate in training that includes new psycho-motor skills and new thought processes, all of which divide and distract the new shooter's attention. Some of these distractions are; recoil, concussion, reloading drills, malfunction clearance, manipulation skills, shooting positions, timed target facings; and most importantly to the student – successfully qualifying.

The FLETC firearms training curriculum is presented in a manner to teach students the safe, proficient and justified use of a firearm. Students are instructed to place the finger on the trigger when the sights are aligned on the target. Any ND that occurs when the shooter is actively drawing, holstering or presenting the firearm (perpendicular to the shooter and parallel to the ground) is almost certainly the fault of the shooter. It is the shooter's responsibility to manage his/her trigger finger and maintain a safe and proper grip.

The results of each phase of the study are included as tabbed attachments. The finding of each is summarized for initial consideration.

The feedback forms indicate that the shooters with the least experience and training prefer the auto-lock trigger finger manipulation holsters over thumb release style holsters. As training and experience increases (CITP students), there is a shift to prefer a more traditional holster. The feedback from the majority of the FAD staff that participated in the study indicates that (b) (5)

(b) (5)

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(b) (5) (Tab A).

The proctors that administered the testing are all SMEs from our Basic or Advanced Firearm Training Programs. They are the Lead Instructors with program oversight for; Criminal Investigator Training Program (CITP), Uniformed Police Training Program (UPTP), Land Management Police Training (LMPT), Reactive-Shooting Instructor Training Program (RSITP) and Firearms Instructor Training Program (FITP). The recommendation provided by these SME's regarding the use of this style holster range from (b) (5) (b) (5) to

(b) (5)

(b) (5)

(Tab B)."

The frame by frame review of the video from the intern/student portion indicates that during approximately 25% of the draw strokes the shooter's trigger finger was proximal to the trigger and approximately 13% of the draw strokes began out of sequence. This included two-hand draw and presentation as well as one-hand (support hand) draw and presentation (Tab C).

The interview with the CITP student involved in the training accident on December 13, 2011, reveals that the curriculum and presentation of that curriculum was appropriate and complete. The student indicated that he experienced a sequencing error and discharged his weapon. He also indicated that he would no longer use that style holster nor would he recommend its use to others (Tab D).

A review of the curriculum indicates that specific verbiage will have to be added to the lesson plans and risk assessment if this style holster is to be used on FLETC Ranges (Tab E).

An informal survey was conducted of commercial and private firearms training facilities. The responses included; this style of holster can be used but must have the release mechanism disabled, or cannot be used at our facility (Tab F).

A review of the FAD SOPs indicate that specific verbiage regarding approved holster use on FLETC Ranges will need to be excerpted from an archived SOP and added to a current SOP or updated, approved and re-instated as a current SOP (Tab G).

It should be noted that the FLETC has enacted holster restrictions in the past (circa 1975-1978). These restrictions included; a prohibition of shoulder holsters and cross-draw holsters. These two types of holsters do not allow for a firearm presentation that directs the muzzle straight downrange without pointing the muzzle at other students or staff. An additional prohibition included holsters that did not cover and protect the trigger and trigger guard of revolvers. This holster design created an unsafe training environment that included Unintentional and Negligent Discharges. These prohibitions are still in effect on FLETC Ranges.

This holster is a well-constructed retention holster which functions very well in that regard. Holster design is not the sole causative factor for any of these incidents. Shooter error related to violation of one of the four cardinal firearms safety rules is a contributing factor for these discharges. However, a holster system that places the trigger finger proximal to the trigger is most certainly a recognized risk. This risk becomes significant when problems such as; sequencing errors, duress and divided attention is known to occur during live-fire training. Individually any of these factors can cause a potential ND. When combined, there exists an increased probability of a repeat occurrence which could result in injury or death. We as trainers should reduce or eliminate as many of these known factors from our training ranges as possible.

In order to continue to allow the use of auto-lock trigger finger manipulation holsters, the FLETC firearms curriculum will have to be modified to include training on the use of this specific style holster. This would require the addition of time to the existing curriculum or the deletion of time otherwise allocated to another facet of the firearms curriculum. It should be noted that use of this type of holster is not universal among the POs.

Recommendation

As previously stated, this holster [Blackhawk SERPA CQC Level II Holster (low wall and high wall)] is designed as a level II retention holster and the retention feature works as designed and

intended by the manufacturer. It is a well-constructed retention holster which functions very well in that regard. However, the Level I Study conducted by the FAD concluded there are inherent dangers associated with the use of auto lock, trigger finger manipulation holsters for certain agents/officers lacking firearms experience. Holster design is not the sole causative factor for any of these incidents. Shooter error violative of cardinal firearms safety rules is most obviously a contributing factor of discharges with these types of holsters. However, a holster system that places the trigger finger proximal to the trigger most certainly creates an inherent risk. This risk becomes significant when problems such as sequencing errors, duress and divided attention occur during live-fire training and/or operational use.

Based upon the known facts, SME observations and both the "low wall" and the "high wall" holster study findings, the GTD and the FTD submits in priority order the following options for consideration:

1. The GTD and FTD recommends that the FLETC restrict the use of level II retention, auto lock-trigger finger release style holsters, to include the "low wall" and "high wall" configurations, during all firearms training on FLETC firearms ranges. Holsters that possess a single retention release mechanism that is located proximal to the trigger area of the firearm are problematic and pose a safety hazard. Holsters that include additional release mechanisms (Level III retention) should be evaluated for suitability prior to use on FLETC firearms ranges. This restriction will be classified as a "local range rule" which the FLETC has used in the past to improve safety practices during firearms training at all FLETC training sites.

If this option is approved, an Executive Summary and Decision is attached for the Director's signature and dissemination to the Partner Organizations (PO).

Approve (b) (6) (b)(6) 8/2/12 Disapprove _____
Modify _____ Needs more discussion _____

2. (b) (5)

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Approve _____ Disapprove _____
Modify _____ Needs more discussion _____



EXECUTIVE SUMMARY AND DECISION

HOLSTER STUDY SYNOPSIS

As a result of four separate incidentsⁱ related to auto-lock, trigger finger manipulation holsters [Blackhawk SERPA CQC Level II holstersⁱⁱ (low wall)], the Federal Law Enforcement Training Center (FLETC) requested that a study be conducted to identify any common causative factors unique to this holster design. The study was assigned to Firearms Division (FAD) at FLETC-Glynco with assistance from the FLETC Field Training Directorate (FTD). A subsequent companion study of the Blackhawk SERPA CQC Level II Holster (high wall) was also conducted which resulted in similar findings.

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SUMMARY OF FINDINGS

The conclusions and results gathered from the analysis of holster testing and participant feedback was captured in separate reports at the completion of both the studies.

- Duress is experienced by the shooter when draw-stroke steps are executed out of order. This *sequencing error* can then initiate a *cascading series of failures*^{iv}. This series of failures is first recognized by the shooter as an inability to draw the firearm from the holster.
 - This inability is caused by:
 - The tension caused by the upward pressure of the draw stroke occurring prior to the deactivation of the retention mechanism.
 - Unless deactivated prior to the draw action, this feature “locks” the pistol in the holster. Once locked, the shooter experiences a greater amount of *duress*.
 - The shooter then tends to use more force in an effort to remove the weapon from the holster and tends to transition from *digital-pad* to *digital-tip* pressure which causes the trigger finger to bend. Also, the associated increase in grip pressure causes *all* of the fingers of the strong hand to flex, further increasing the flex or bend of the trigger finger.
 - When the firearm is finally removed from the holster, this bend in the trigger finger positions the finger proximal to the trigger or on the trigger.

- The feedback from the majority of the FAD staff^v that participated in the study indicates that a holster that requires multi-tasking of the trigger finger or that has a release mechanism closely

proximal to the trigger is potentially problematic by increasing the risk of an inadvertent discharge. Subsequent review of the studies by the FLETC FTD SMEs also concluded that proximity of the finger to the trigger creates an inherent safety risk.

- The proctors that administered the testing are all SMEs^{vi} from the FLETC Basic and/or Advanced Firearm Training Programs and. The recommendation provided by these SMEs regarding the use of this style holster range from *“hesitant to recommend the use of”* to *“should not be used in training.”*
- The frame by frame review of the video from the intern/CITP student portion of the psychomotor skills testing indicates that during approximately 25% of the draw strokes the shooter’s trigger finger was proximal to the trigger and approximately 13% of the draw strokes began out of sequence (low wall study).
- The interview with the CITP student involved in the training accident on December 13, 2011, revealed that the curriculum and presentation of that curriculum was appropriate and complete. The student indicated that he experienced a sequencing error and discharged his weapon.
- An informal survey was conducted of commercial and private firearms training facilities. Several responses included; *this style of holsters can be used but must have the release mechanism disabled, or cannot be used at a facility.*

DECISION

Based upon the known facts, SME observations and both holster study findings, the FLETC submits the following training decision:

- The FLETC is restricting the use of level II retention, auto lock-trigger finger release style holsters during *all* firearms training on FLETC firearms ranges. Holsters that possess a single retention release mechanism that is located proximal to the trigger area of the firearm are problematic and pose a safety hazard. Holsters that include additional release mechanisms (level III retention) should be evaluated for suitability prior to use on FLETC firearms ranges. This restriction will be classified as a “local range rule” which the FLETC has used in the past to improve safety practices during firearms training at all FLETC training sites.

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Connie L. Patrick, Director
Federal Law Enforcement Training Center

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firearm in the holster when the firearm is inserted. There is no need to manipulate any portion of the holster to secure the firearm. The release for the retention mechanism is located on the exterior of the holster on the outboard side, in the area of the trigger/trigger guard of the firearm. To operate the release the shooter establishes his/her strong-hand grip, extending and straightening the index finger (trigger finger). The shooter then applies *digital-pad* pressure with the trigger finger to the "release button". This action deactivates the retention device allowing the shooter to draw and present the firearm.

ⁱⁱⁱ This testing consisted of a series of draw stroke drills that commenced with 4 second facings and were reduced incrementally to .75 seconds. These skills were conducted both strong-hand (two-hand) and support-hand (one-hand).

^{iv} A cascading series of failures is best described as non-sequenced, repetitive actions that place the shooter in danger of experiencing a Negligent Discharge.

^v This group consisted of 49 FAD instructional staff members (FLETC staff and Partner Organization (PO) representatives) with approximately 294 years of instructional experience.

^{vi} These SMEs possess 120 years of active firearms training experience. They are the Lead Instructors with program oversight for the following programs: CITP, UPTP, LMPT, RSITP, SSTP, LERTP and FITP.



Homeland Security

July 2, 2012

INFORMATIONAL MEMORANDUM

MEMORANDUM FOR:

(b) (6)

(b)(6)

Branch Chief, FAD, Instructor Training Branch

FROM:

(b) (6)

(b)(6)

Lead Instructor, FAD/Instructor Training Branch

(b) (6)

(b)(6)

Tactical Training Programs Branch

SUBJECT:

Thumb Deactivated Retention Holsters

On July 2, 2012, (b) (6) and I were asked to review the videos from the initial holster study conducted in January, 2012. During the original recording we were primarily concerned with getting footage of the participants utilizing the Blackhawk Serpa Holster. However, we also had two other types of holsters available for the participants to practice with. We had them use these holsters while we were recording the Serpa Holster. This allowed the participants with little or no experience to practice the basics fundamentals of grip and draw techniques, and would also give them another type of holster to compare to the Serpa holster. It should also be noted that when we first started the study, we did not have enough of the Serpa Holsters for everyone to participate at the same time, and we only had three video recorders to film the exercise. While recording the participants using the Serpa holster, we also caught some of the footage of the participants using the other holsters.

One of the holsters was the DeSantis Style 1 holster, the other was the Safariland #6280 SLS (Self Locking System). The DeSantis Style 1 Holster is a level one holster which retains the weapon into the holster with a thumb-break keeper which is deactivated with the shooting hand thumb. The Safariland #6280 SLS is a level two holster which has a hood / bail system which must be first pushed down and then pushed forward with the shooting hand thumb to remove the weapon from the holster.

During the review of the videos we were able to see three different shooters using these holsters. Although the camera was focused on the shooter testing the trigger finger release holsters, some of the subjects using the aforementioned holsters were recorded in the

background or periphery. We are only providing our findings on the draw strokes that we could clearly see and evaluate.

We reviewed the recordings in slow motion to ensure we didn't miss any contact with the trigger, and to make sure the shooters didn't have their trigger finger anywhere near the trigger. We were able to clearly review 38 total draw strokes, from three different participants. At no time did any of the shooters have their trigger finger in, around, or on the trigger.

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Lead Instructor, Firearms Division
Firearms Instructor Training Branch

(b) (6)

(b)(6)

Lead Instructor, Firearms Division
Tactical Training Programs Branch

TAB A

Pages 13 through 78 redacted for the following reasons:

(b)5 Deliberative Process Privilege

TAB B



Homeland Security

January 18, 2012

115-500 (GTD/FAD)

MEMORANDUM FOR:

(b) (6), (6)

Branch Chief, FAD/ITP

FROM:

(b) (6), (6)

Lead Instructor, FAD/CPB

SUBJECT:

Auto lock style holsters that require the trigger finger to de-activate the retention device. (SERPA type holsters)

As a result of my participation in the evaluation of the auto lock style holsters that require the trigger finger to de-activate the retention device. (SERPA type holsters).

I have several concerns with this type of holster.

Numerous training facilities have banned this holster from use stating that accidental shooting could or have occurred using this type of retention device.
(Please see my previous memorandum for more details)

While conducting grip and draw drills using this style of holster with FLETC Firearms Instructors. I overheard instructors participating in the drills state that their trigger finger came into contact with the trigger during the draw stroke prior to the weapon being pointed in a safe direction.

Another concern is the possibility of the locking mechanism jamming do to debris not allowing the officer to draw the weapon when needed.

It is my opinion that (b) (5)

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(b) (5)

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Homeland Security

January 18, 2012

115-500 (GTD/FAD)

INFORMATION

MEMORANDUM FOR: (b) (6) (b)(6)
Branch Chief, Firearms Division

FROM: (b) (6) (b)(6)
Lead Instructor, Firearms Division

SUBJECT: Holster Evaluation

Purpose

To evaluate the Blackhawk Serpa Auto-Lock Holster.

Background

During the week of January 9–13, 2012, I took part in an evaluation/study on the use of the Blackhawk Serpa auto-lock style holster. This style holster requires the use of the trigger finger to de-activate the retention device. This study consisted of 3 different participant groups all at different levels of training and competency. One group consisted of college interns with little or no firearms experience. The second group was made up of Criminal Investigator Training Program students nearing the end of their training and the third group consisted of FLETC and detailed Firearms Instructors. Each group was given holsters that utilized a thumb break retention device, as well as, the auto-lock retention device. The groups were given a briefing on the proper use of each holster. They were then tasked with drawing the weapons without time limits and drawing the weapons under decreasing time limits. These drills were conducted with the shooters using the shooting hand and support hand only.

Discussion

(b) (5)

(b)(5)

(b) (5)

(b)(5)



**Homeland
Security**

January 20, 2012

115-500 (GTD/FAD)

INFORMATIONAL MEMORANDUM

MEMORANDUM FOR:

(b) (6) (b) (6)

Branch Chief, FAD, Instructor Training Branch

FROM:

(b) (6) (b) (6)

Lead Instructor, FAD, Reactive Shooting Instructor Training Program

SUBJECT:

Auto Lock, Trigger Finger Manipulation Holsters

I was tasked with the assignment of evaluating auto lock, trigger finger manipulation holsters. The evaluation period started on January 9, 2012 and concluded on January 13, 2012. The goal of the evaluation was to identify any positive and / or negative characteristics of these types of holsters and determine if the current Firearms Division (FAD) curriculum supported the use of this style holster in our basic training programs. The evaluation was conducted by administering a set of draw stroke drills to FAD Staff, Criminal Investigation Training Program Students, and Interns. All participants were briefed on the proper technique to draw the weapon from this type of holster and given ample time to practice prior to participating in the exercise. The drills were performed with "safe" red guns and included Glock and Sig Sauer Models with the appropriate holster for each.

The exercise started with the participants drawing and pressing the trigger one (1) time in four (4) seconds. After completing four (4) repetitions at four (4) seconds, the time was reduced to three (3) seconds. The exercise followed this pattern until the time frame was reduced to one (1) second. Each participant was then given four (4) target facings at a time frame of three-quarters (.75) of a second. At the conclusion of the exercise, each participant had attempted twenty (20) total draw strokes with time elapsing from four (4) seconds to three-quarters (.75) of a second after every fourth draw stroke.

From my observations, most of the participants had little trouble with the time frame above two (2) seconds. Once the time frame was reduced to two (2) seconds and below, certain trends became apparent to me. With the shortened time frame, participants started applying upward pressure on the weapon prior to fully releasing the auto-lock mechanism of the holster. Participants were briefed to relax the upward pressure of the weapon and depress the auto-lock release button with the pad of the finger if this happened during the drills. Under a sense of urgency to draw the weapon, I did not observe the participants using the proper technique described and demonstrated to them. The tendency the participants showed when this occurred

was to increase the upward pressure on the weapon and curl their trigger finger toward the holster in an attempt to depress the auto-lock mechanism. Using this technique, when the weapon did eventually release from the holster, I observed numerous participants place their finger inside the trigger guard inadvertently. I must also note that the weapon was still pointed at either the participant's leg or the ground in front of them when this occurred.

The participants were then administered drills using only their support hand to draw the weapon and achieve a trigger press on the target. The exercise was conducted in the same fashion as the normal draw stroke prior with each participant performing twenty (20) draw strokes with time frames elapsing throughout. My observations were the same as before. As time frames became shorter, the participants struggled to get the weapon from the holster, and inadvertently placed their fingers inside the trigger guard prior to rotating their weapon down range.

The holster evaluation process was conducted with varying degrees of experience from the participants. The participants experience ranged from subject matter experts (Staff), recently trained FLETC students (CITP), to Interns with no experience. I observed the holster to be light weight and have a positive law enforcement advantage by automatically securing the weapon when placed in the holster. During the evaluation process, I further observed many safety violations from all levels of participants throughout the exercises. The positive aspect of easily securing the weapon is far outweighed by the potential safety problems of using the trigger finger to release the auto-lock mechanism of the holster.

Based on my observations I do not believe that this style holster is suitable for training within the FAD curriculum. Use of the trigger finger to release the weapon from the holster caused too many safety concerns which coincidentally caused numerous violations of the FAD safety principles of trigger finger management.



**Homeland
Security**

January 18, 2012

115-500 (GTD/FAD)

INFORMATIONAL MEMORANDUM

MEMORANDUM FOR:

(b) (6) (b)(6)

Branch Chief, FAD, Instructor Training Branch

FROM:

(b) (6) (b)(6)

Lead Instructor, FAD, Instructor Training Branch

SUBJECT:

Auto Lock, Trigger Finger Manipulation Holsters

The week of January 9, through January 13, 2012, I was given an assignment to evaluate the Blackhawk SERPA type holster. To conduct this evaluation we brought in Interns, Criminal Investigator students, and Firearms Instructors from FLETC as well as Partner Organizations. When the participants were given the holster, they were also briefed on the proper way to draw the weapon from the holster, and advised to make sure they kept their finger off the trigger while drawing and re-holstering the weapon. We also demonstrated how to properly deactivate the retention device with the base of their index finger and not the tip of the index finger.

During the briefing we also made sure all the students were aware that the retention device or button must be pressed prior to applying any upward pressure on the weapon, or the weapon would be difficult if not almost impossible to remove from the holster. During the evaluation we ran the participants through a series of drills consisting of drawing the weapon without any time limits, drawing under time limits, and drawing the weapon with the support or weak hand only.

The students were given several minutes to familiarize themselves with the holster prior to invoking any time limits. The first drill was to draw the weapon and dry fire one time in a four second time limit. We did each time limit four times and then we reduced the time by one second. We eventually were able to get most participants down to .75 or three quarters of a second.

While observing the shooters I saw most of them get "hung up" in the holster because they started to apply upward pressure on the gun prior to deactivating the retention device. Once a shooter was hung up they pressed in harder with the tip of the trigger finger to free the weapon from the holster. Occasionally I saw some of the participants trigger finger go in, around, and even on the trigger after the weapon was free of the holster.

The last drill conducted was drawing and dry firing with the support hand only. Most of the shooters were much slower using the SERPA-type holster than they were with a conventional thumb break holster. To deactivate the retention device using the support hand only, most shooters used their middle finger to release the weapon from the holster. The shooters were slower getting out of the holster, the weapon got hung up in the holster, and the middle finger got inside the trigger guard, and sometimes made contact with the trigger.

The holster has very good retention qualities, and is very light weight and compact. Another good quality of the holster is it is very easy and quick to return the weapon to the holster. All the shooter has to do is place the gun down into the holster, and it automatically locks into place.

It is my belief that the trigger finger should have one function when it comes to firearms training. The index or trigger finger should only be used to operate the trigger and not a retention device on a holster. I recommend that any holster requiring the trigger finger to deactivate the retention device not be allowed on FLETC Ranges. I feel that this design makes it much more likely for a shooter to contact the trigger when drawing the weapon, and will result in more training accidents if we allow it to be used at the FLETC.



Homeland
Security

January 18, 2012

115-500 (GTD-FAD)

INFORMATIONAL MEMORANDUM

MEMORANDUM FOR:

(b) (6) (b) (6)

Branch Chief, Firearms Division

FROM:

(b) (6) (b) (6)

Lead Instructor, Firearms Division

SUBJECT:

Holster Evaluation (9 Jan – 12 Jan, 2012)

From January 9th through January 13th I was an observer during an evaluation/study on the use of the Blackhawk SERPA auto-lock style holster. This style holster requires the use of the trigger finger to de-activate the retention device. Participants included students with little or no firearms experience (FLETC interns), Criminal Investigator Training Program (CITP) shooters in week 9 of 12, and FLETC and/or agency detailed firearms instructors. Each group was given holsters that utilized a thumb break retention device (Safariland ALS and standard-issue pancake style) as well as the auto lock retention device, and Safe weapons (unable to fire live ammunition, but correct in all configurations). The groups were given a briefing on the proper use of each holster and then tasked with drawing the weapons without time limits and then drawing under decreasing time limits. These drills were conducted with the shooters using the shooting hand and support hand only.

During these drills very few people had problems with the thumb break style holsters. The auto lock holsters presented a few issues. The first observation made was that under decreased time limits some of the participants would try to draw the weapon without first de-activating the retention device which made the shooter unable to complete the draw stroke. The second issue was that because the auto lock retention device is released by utilizing the trigger finger many of the shooters made contact with the trigger during the draw stroke. Another issue relayed by some of the shooters was that when drawing support hand only it was more difficult to reach the retention device on the auto lock holster.

My post evaluation recommendation is that students attending BASIC training should NOT use the trigger-finger release type of holster (no matter the experience level). The bottom line is that "Perfect practice makes perfect", and the possibility of a negligent discharge with ANY holster still exists. However, by removing the manipulation of the trigger finger to disengage any retention device, it lessens the possibility of placing the trigger finger in an unwanted/unsafe position, and /or a possible negligent/unintentional discharge.

TAB C



**Homeland
Security**

January 20, 2012

115-500 (GTD/FAD)

INFORMATIONAL MEMORANDUM

MEMORANDUM FOR:

(b) (6) (b) (6)

Branch Chief, FAD, Instructor Training Branch

FROM:

(b) (6) (b) (6)

Lead Instructor, FAD, Instructor Training Branch

SUBJECT:

Holster Study – video results

The video from the study was reviewed by Lead Instructor's (b) (6) (b) (6) and me. This was a frame by frame review of the Interns and the CI Students using the SERPA type and conventional thumb-break or bail holsters. It should be noted that there were certain limitations related to the use of this commercial grade equipment.

During the two handed shooting stage we found that approximately 22% of the time the shooters trigger finger was in, around, or made contact with the trigger, and about 13% of the time the shooter started to remove the weapon from the holster (double clutch) prior to deactivating the retention device. This seemed to happen more frequently as the time limit was decreased.

During the support hand only stage we found that approximately 31% of the time the shooters trigger finger was in, around, or made contact with the trigger, and about 12% of the time the shooter started to remove the weapon from the holster (double clutch) prior to deactivating the retention device. This also seemed to happen more frequently as the time limit was decreased.

Overall we found that about 25% of the time the trigger finger was not located where we would like to see it during a proper and safe draw, and about 13% of the time the shooter started to remove the gun from the holster prior to deactivating the retention device, which often resulted in poor trigger finger placement during the draw.

TAB D



Homeland
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January 13, 2012

115-500 (GTD/FAD)

INFORMATIONAL MEMORANDUM

MEMORANDUM FOR:

(b) (6), (b) (6)

Branch Chief, FAD, Instructor Training Branch

FROM:

(b) (6), (b) (6)

Lead Instructor, FAD, Instructor Training Branch

SUBJECT:

Interview of (b) (6), (b) (6)

On January 10, 2012, at 1030 hours, Instructor (b) (6), (b) (6) and I conducted an interview with (b) (6), (b) (6). On December 13, 2011, (b) (6), (b) (6) is the agent in CITP 202 who accidentally shot himself with a Glock 22, using the Blackhawk SERPA Holster while participating in Tactical Threat Engagement on Range #5. The interview lasted approximately 45 minutes, and the following is a brief narrative of the interview and his response.

We asked (b) (6), (b) (6) if he had any prior Law Enforcement, or weapons handling experience. His response was that did not. He also stated that FLETC Staff made him fully aware of all the safety rules, more notably he said that the staff on a daily basis told the class to keep their finger off the trigger when drawing and re-holstering. We then asked if he had ever been cautioned by any Firearms Instructor about any safety violations committed by him. Mr. (b) (6), (b) (6) responded that he had not.

The next set of questions was in reference to why and when he purchased the Blackhawk SERPA Holster, as well as when he started using the new holster. (b) (6), (b) (6) stated that a couple of his classmates were using the SERPA Holster, and that it worked very well during ORT retention exercises. (b) (6), (b) (6) stated that he had purchased the holster prior to his class shooting their qualification, but did not use it during live fire exercises until the day of the accident. He said that he had practiced in his room and used it during ORT and in other divisions while participating in practical exercises not involving live fire. (b) (6), (b) (6) said he roughly had two or three hours of practice with the holster prior to the accident.

The next question was directed at the time of the accident. We asked if he felt that he was under stress at the time of the accident, and if he recalled what happened. He said he was not under any kind of stress but was doing something that was unfamiliar to him. Because of his lack of experience with firearms, he felt the rest of the shooters on his side of the range were better shooters. (b) (6), (b) (6) said at the time of the accident they were doing 90 Degree Pivots.

When the accident happened, he said when I tried to draw the gun, and it seemed to have got hung inside the holster. At that time he pushed in on the retention button harder to free the weapon. Once the weapon broke free from the holster he realized that he had just fired the gun. He said by pressing in on the button harder, and removing the gun from the holster, his finger went onto the trigger with still enough pressure to fire the gun. He also said that he did not know that he had been shot until he looked down and saw smoke rising from his pants.

Next we asked him a series of questions about the continued use of this holster by himself as well as the rest of the student population at the Federal Law Enforcement Training Center. Mr.

(b) (6) told us that he discontinued the use of the SERPA Holster after the accident. He also (b) (5)

(b) (5)

Finally we asked him if he thought this would or might have happened if he would have used the conventional thumb break holster he was issued on that day. (b) (5) (b) (5)

(b) (5) We also asked if he thought this would have been avoided if he would have used this (SERPA) holster from the beginning of his training. (b) (5) (b) (5)

(b) (5) (b) (5)

TAB E



Homeland Security

January 18, 2012

115-500 (GTD/FAD)

INFORMATION

MEMORANDUM FOR: (b) (6) (b)(6)
Branch Chief, Firearms Division

FROM: (b) (6) (b)(6)
Lead Instructor, Firearms Division

SUBJECT: Recommended curriculum additions.

Purpose

To make additions to curriculum that addresses Auto-Lock Holsters.

Background

Recently an evaluation/study was done on the use of the Blackhawk Serpa auto-lock style holster. This style holster requires the use of the trigger finger to de-activate the retention device. This study consisted of 3 different participant groups all at different levels of training and competency.

Discussion

At the conclusion of the drills the auto-lock holsters presented a few issues. The first observation made was that under decreased time limits some of the participants would try to draw the weapon without first de-activating the retention device which made the shooter unable to complete the draw stroke. The second issue was that because the auto-lock retention device is released by utilizing the trigger finger many of the shooters made contact with the trigger during the draw stroke. Another issue relayed by some of the shooters was that when drawing support hand only it was more difficult to reach the retention device on the auto lock holster.

(b) (5)

(b)(5)

TAB F



Homeland Security

January 17, 2012

MEMORANDUM FOR: (b) (6)
Branch Chief, Firearms Division

FROM: (b) (6)
Lead Instructor, Firearms Division

SUBJECT: Auto Lock, Trigger Finger Manipulation Holsters (SERPA) Type
Holsters

I have been in contact with various training facilities though out the country concerning training issues with the SERPA type holsters.

The following training facilities *do not* allow students to train with these type holsters do to safety concerns.

- **Front Sight Training Facility Las Vegas NV.**
- **K.R. Training Austin TX.**
- **Wilson Tactical Training Bothell WA.**
- **Vickers Tactical Inc. Fayetteville, NC.**

This below listed training facility *allows* SERPA type holsters but requires modifications to the holster by disabling the locking device prior to training. I personally do not recommend modification of the holster. If the locking mechanism is disabled and the Student trains with it disabled. The student will forget to disengage the retention in a deadly force encounter

- **Combat Tactical Academy, Las Vegas NV.**

Please find attached supporting documentation from the facilities listed above.

Front Sight Training Facility. Las Vegas NV

We do not allow the Blackhawk Serpa holster or holsters of similar construction with a retention device in the trigger guard.

Listed below are training incidents listed on the Front Sight Training Facility website

Incident #9 - Here are the facts:

- Incident occurred on June 21, 2010 , the final day of a four-day defensive course at approximately 4:30 p.m.
- 18 students were on the firing line along with the Front Sight Range Master, Instructors and other Line Coaches.
- The students were at 7 yards and shooting at turning, electronic targets.
- The student was presenting his weapon from a concealed holster when the incident occurred.
- The student was doing very well in the course with no indications of improper procedures or safety violations.
- Weapon used was a Springfield Armory XD 45 ACP handgun with no obvious modifications.
- Holster was an unmodified, Blackhawk Serpa CQC designed for the Springfield XD.
- Bullet was 230 grain, full metal jacket.
- The student was immediately cared for by Front Sight's staff.
- The bullet entered the upper thigh just below the belt and forward of the holster. The bullet traveled just under the skin for approximately 18 inches, exited from under the skin at about knee level.
- The bullet struck the ground near the student's feet and was recovered.
- First aid in the form of a compression bandage and vital sign monitoring was administered by Front Sight's staff. The student remained remarkably calm with strong vital signs.
- The student was transported by helicopter to a hospital emergency room in Las Vegas .
- The student was cared for at the emergency room and discharged within two hours.

Opinions:

The only way a weapon can be fired is to place a finger on the trigger and then press the trigger. Using the physical evidence available and discussions with student, it appears the only explanation for this incident is the following:

On the presentation or "draw stroke" of his weapon, the student swept the concealment garment away, established the proper firing grip with finger along the outside of the holster. As he began to withdraw the weapon from the holster, he likely violated Safety Rule 3 and allowed his finger inside the trigger guard and subsequently pressed the trigger causing the weapon to fire.

Remember that the proper draw stroke involves keeping your finger out of the trigger guard and off the trigger until the weapon is pointed downrange at the target. Again, the only way a weapon can be fired is to press the trigger.

Incident #10 - Here are the facts:

- Incident occurred on February 7, 2011, the final day of a four-day defensive handgun course at approximately 2:00 p.m.
- 19 students were on the firing line along with the Front Sight Range Master, two other Instructors, plus all student Coaches for a 1-to-1 ratio of students to coaches.
- The students were at 7 yards shooting head shots from a concealed holster.
- Weapon used was a Springfield XD 40 caliber handgun with no obvious modifications.
- Bullet was a 180 grain, full metal jacket "ball" round.
- The holster was a Blackhawk Serpa designed for the XD and was equipped with a trigger guard retention device.
- The bullet hit the top of the holster before passing through the pants and entering the upper thigh about five inches below the point of the hip. There was no exit wound.
- The student was immediately cared for by two Front Sight staff members.
- First aid in the form of a compression bandage, supplemental oxygen, and vital sign monitoring was administered by Front Sight staff. The student remained remarkably calm with strong vital signs.
- The student was transported by helicopter to a hospital emergency room in Las Vegas.
- The bullet had lodged near the knee and was left in place by the physicians. The student was released from the hospital in under two hours.

Opinions:

The student commented that when he presented the weapon, his finger slipped onto the trigger after disengaging the retention device of the holster. This is a clear violation of Safety Rule 3 which caused the weapon to fire.

Remember that the proper "draw" stroke involves keeping your finger out of the trigger guard and off the trigger until the weapon is pointed downrange at the target. Again, the only way a weapon can be fired is to press the trigger.

Incident #11 - Here are the facts:

- Incident occurred on April 12, 2011, the second day of a four-day defensive handgun course at approximately 3:20 p.m.
- 18 students were on the firing line along with the Front Sight Range Master, three other Instructors, plus the student coaches for a 1-to-1 ratio of students to coaches.
- The students were at 7 yards and shooting controlled pairs from an exposed holster.

- Weapon used was a Springfield 1911 45 ACP caliber handgun with no obvious modifications.
- Bullet was a 230 grain, full metal jacket "ball" round.
- The holster was a Blackhawk Serpa designed for the 1911 and was equipped with a trigger guard retention device.
- The bullet passed through the pants and entered the upper thigh below the point of the hip. The bullet exited just below the knee.
- The student was immediately cared for by two Front Sight staff members as well as a student who was a medical doctor.
- First aid in the form of a compression bandage, supplemental oxygen, and vital sign monitoring was administered by Front Sight staff. The student remained very calm with strong vital signs.
- The student was transported by helicopter to a hospital emergency room in Las Vegas where his wounds were treated and he was discharged.

Opinions:

Upon "drawing" the weapon from the holster, the student disengaged the thumb safety on his 1911 way too soon (at Count 1 or 2 instead of Count 4). Additionally, the student's finger slipped onto the trigger after disengaging the retention device of the Serpa holster. This was a clear violation of Safety Rule 3 and caused the weapon to fire.

Remember that the proper "draw" stroke involves keeping your finger out of the trigger guard and off the trigger until the weapon is pointed downrange at the target. Again, the only way a weapon can be fired is to press the trigger.

Incident #12 - Here are the facts:

- Incident occurred on October 20, 2011, the final day of a 4-Day Defensive Handgun course at approximately 2:00 p.m.
- 15 students were on the firing line along with the Front Sight Range Master, three other Instructors, plus the student coaches for a 1-to-1 ratio of students to coaches.
- The students were at 7 yards shooting headshots from a concealed holster.
- The weapon was a Glock 34, 9mm caliber handgun with no obvious modifications.
- The bullet was a 115 grain, full metal jacket "ball" round.
- The holster was manufactured by Black Hawk (not a Serpa model)
- The student fired the prescribed headshot but was unhappy with the results. In frustration, he dropped the weapon down to the side of his body. While "dangling" the weapon near his leg, he fired a single round.
- The bullet passed through the pants and entered the leg about 4-5" below the knee. The bullet traveled under the skin for about 4" before exiting
- The student was immediately cared for by a Front Sight staff member.
- First aid in the form of a compression bandage and vital sign monitoring was administered by Front Sight staff. The student remained very calm with strong vital signs.
- The student was transported by ambulance to a hospital emergency room

Opinions:

After firing the prescribed headshot, the student was frustrated and dropped the weapon down to his side...with his finger still on the trigger. This was a clear violation of Universal Firearms Safety Rules #2 and #3. Rule #2 states "never let the muzzle cover anything you are not willing to destroy". Rule #3 states "keep your finger OFF the trigger until you are ready to shoot." Violating both of the above rules at the same time, the student inadvertently fired a single round which entered his calf. Remember, the only way a weapon will fire is by pressing the trigger.

K.R. Training, Austin, Texas - Karl Rehn

BLACKHAWK SERPA HOLSTER PROHIBITED IN KR TRAINING CLASSES

Based on an evaluation of policies implemented at other schools, and analysis of multiple incidents of self-inflicted gunshot wounds in training classes taught at other schools, individual incidents, and competitions, we have decided to prohibit the use of the Blackhawk SERPA holster in our classes.

This [video](#) shows a shooter firing a round into his leg while using a SERPA holster, and [this video](#) has a nice analysis of the fundamental design flaws in the SERPA holster and how they led to that (and many other) self-inflicted shootings

Vickers Tactical - Larry Vickers

Yes I have banned it based on the fact they set the stage for an accidental discharge - particularly with beginners

Hope this helps

Be safe

Larry Vickers

Wilson Tactical website

Due to several unintentional discharges associated with the Blackhawk Serpa holster, I decided to test and evaluate the holster system. This test was conducted using the blackhawk Serpa level II holster system. This test involved introducing shooters of varying skill levels to various shooting and tactical exercises.

When you use this holster on a static range it seems like it is good to go. Over the past year I have personally seen three separate individuals have an unintentional discharge with this holster. I have heard of twelve others having unintentional discharges during courses of fire. One story I heard about involved

an off duty police officer who was working a gig in WA State. He was carrying the Glock 22 in a Serpa holster. This officer had recently purchased the Serpa holster, so he wanted to develop more muscle memory with the holster. He was practicing his draw in the back room at a grocery store when he shot himself in the leg. These are just the cases I have heard from other instructors in WA State. I am sure there are many more around the world.

I understand that the majority of the time the unintentional discharge was caused by operator negligence; which is why I conducted this test. Since I am seeing this holster gain popularity and I keep experiencing horror stories associated with it, I decided to give the holster the benefit of the doubt and analyze it further. My goal was to see if this was a poor design, or if these issues were all caused by operator error.

The Serpa holster requires the user to extend the index finger to the same general location one would index along the frame of the gun. My first thought was this is where we want the index finger if we are not intending to shoot. The user must then press a button, which is located in the same general area as the trigger group and under spring tension, to release the pistol. This button relies on spring tension to disengage the internal retention system and return the internal retention system. Again, on a static range this holster seems like a good design. Under the tense, uncertain, and rapidly evolving conditions of a force on force encounter this holster is a disaster.

The average shooter operates at about 50% to 60% of their normal functioning abilities when they are under stress. While this number is not a scientific fact, in my opinion it is a very generous estimate, based on my experience. If you disagree with it, I think we can all agree that no matter what your skill level is you will not operate at 100% during the tense, uncertain, and rapidly evolving deadly force encounter. This means that pressing a small button in the same general area as the trigger can result in the trigger finger prematurely engaging the trigger. This is due to the continuation of the extension of the trigger finger that is required to disengage the retention system, and the fact that it takes a small amount of force to press the button to release the pistol. Lets put it in motion, you are placed in a tense, uncertain, and rapidly evolving encounter with a really bad guy. You want to defend yourself with your firearm, but now due to the normal human response to this incident, you are experiencing loss of motor nerve function and only operating at a percentage of your best. You are now required to press a small button, which is under spring tension and requires a small amount of force to press in order to release your pistol. Now you are trying to press the button, pull the pistol out of the holster, and orient the muzzle toward the bad guy in one fluid motion. This results in the trigger finger entering the trigger guard and prematurely making contact with the trigger, which could result in an unintentional discharge. As the finger presses the button to release the pistol, the natural response is to follow through with the action and continue pressing the button as you draw the pistol from the holster. As the pistol comes out of the holster the ideal scenario is that the finger will contact the frame. My experience is that it does on the static range. For the reasons explained here in, when the shooter is placed under the tense uncertain and rapidly evolving force on force encounter it is another story. As a result of my test, I do not believe it is even possible for one to prevent this from occurring under the tense, uncertain, and rapidly evolving encounter. I will explain, under the tense, uncertain, and rapidly evolving deadly force encounter, one is placed under tremendous stress. The muscle group does not have the ability, or time, to relax after the shooter grips the pistol, applies force to press and release the gun from the holster. This results in the trigger finger prematurely making contact with the trigger even before your muzzle is oriented to the threat.

This test was conducted by placing individuals in force on force encounters armed with simunitions gear. Keep in mind that there is overwhelming evidence that this holster proves to be disastrous during any type of dynamic training where the shooter is placed under stress and asked to draw and shoot. The

reports I have heard from other instructors is unintentional discharges during stress induced compressed times, moving drawing and shooting, and drawing to shoot from unusual positions.

Conclusion:

As an instructor, a shooter with 30 years of experience, and a person who has twelve years of market testing and evaluation experience, I do not recommend the Blackhawk Serpa Holster to anyone. In my opinion, this holster creates a range safety issue due to having to use force to press a button, which falls in close proximity to the trigger group; and the space between the trigger group and the index point not being sufficient to prevent the shooter from prematurely engaging the trigger. As a result of my experience with the Serpa holster, and this test, the Serpa holster is now banned from my classes. The Serpa holster is becoming such a problem that other training companies are starting to ban the use of it as well.

Thank you for taking your time to read this test. Be safe!

Jeremy Wilson, Wilson Tactical Training, LLC

Combat Tactical Academy, Las Vegas NV.
John Kerns - Master Instructor.

Serpa Type Holsters *are allowed* in training. The locking mechanism must be *disabled* prior to training

TAB G

FIREARMS DIVISION



Homeland Security

STANDARD OPERATING PROCEDURES

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SUBJECT:

Leather Gear

REMARKS:

SOP: XXX

ISSUED: 04/2006

EFFECTIVE: 04/2006

I. PURPOSE:

The purpose of this Standard Operating Procedure is to establish guidelines and procedures for the use of leather gear in the Firearms Division.

II. SCOPE:

This Standard Operating Procedure applies to all basic and advanced students, provides procedures and guidelines that pertain to these programs, and delineates areas of responsibility for administering the use of leather gear at the FLETC ranges.

~~For Official Use Only~~

III. CANCELLATIONS:

This document supersedes FAD SOP 618, dated July, 2005.

IV. REFERENCES:

None

V. RESPONSIBILITIES:

A. CONTRACTORS -

1. Inventory of holsters and pouches and notifying the COTR when equipment requires replacement.
2. The COTR will survey and replace holsters and pouches.
3. Responsible for setting up the cart based on class schedule.
4. Prepare Issue and Return Form of all items on cart.
5. Issue proper number of holsters and pouches with covered trigger guards for all basic and advanced class coordinators.
6. Ensure that instructors inventory their cart and sign for equipment.
7. Upon return of class equipment, they are responsible to inventory the equipment.
8. Ensure that instructors sign Issue and Return Forms indicating proper return of equipment.

B. CLASS COORDINATORS -

1. Receive equipment from contractors. Conduct a physical count to determine that the proper number of holsters and pouches were received.
2. Sign the Issue and Return Form in proper place prior to removing equipment.
3. Issue holsters with covered trigger guards to all basic and advanced classes.
4. Under exigent circumstances and with permission from the FAD Chief, partner agencies whose SOP permits their students to use holsters with exposed triggers will issue their agency leather gear. Any replacement gear is the responsibility of the issuing agency.
5. If FAD equipment is used, equipment must be counted to ensure the proper number is returned.
6. The class cart is returned to the contract issue room and returned to the contractors.

7. Sign the Issue and Return Form in the proper place after returning equipment.

VI. FORMS:

None

VII. DEFINITIONS:

None

VIII. ATTACHMENTS:

None

IX. PROCEDURES:

- A. Leather gear procedure for basic or advanced students firing on FLETC ranges.
 1. Only FLETC or Agency-issued holsters are to be used.
 2. All students will wear holsters that have covered trigger guards when firing on FLETC ranges except those that have been issued by their agency for use at the FLETC (see Section B #1).
 3. No cross draw, small of the back, fanny packs, or shoulder holsters will be permitted except by permission of the Chief, FAD. This decision will be based upon safety and training requirements.
 4. All students will be given a safety briefing by the Class Coordinator before firing. The Coordinator will emphasize that when drawing and holstering the weapon, the shooter will keep their finger OUTSIDE the trigger guard.
 5. Instruct the students in the proper placement and position of the holster and magazine pouch.
- B. Leather gear procedures for basic and advanced students representing partner agencies that do not limit students to covered trigger guards.
 1. Under exigent circumstances and with permission from the FAD Chief, partner organizations whose SOP permits their students to use holsters with exposed triggers will issue their agency leather gear. Any replacement gear is the responsibility of the issuing agency.
 2. All students will be given a safety briefing by the Class Coordinator before firing. The Coordinator will emphasize that when drawing and holstering the weapon, the shooter will keep their finger OUTSIDE the trigger guard.

3. Student(s) observed drawing with their finger on the trigger will be counseled by the instructor. If this safety infraction continues, the instructor may remove the student from the firing line. For record purposes, the instructor should provide written documentation concerning the justification for the removal.

By order of:

(b) (6)
(b)(6)

04/21/06

(Signature)

(Date)

Walter C. Koran
Chief, FAD
OTA

Attachments:

None