

**PROPOSED INTERROGATORIES
ROBERT J LIGHTFEATHER**

Unless otherwise indicated, the jurors will be given the following choices to answer (See interrogatory #1 for an example):

“YES _____ NO _____ UNKNOWN _____”

Where the question is followed by the parenthetical “(both)” the jurors will be given the following choices to answer (See interrogatory #21 for an example):

Officer Turpin	YES _____	NO _____	UNKNOWN _____
Officer Rogers	YES _____	NO _____	UNKNOWN _____

Where the question is followed by the parenthetical “(contingent)” the jurors will be given the following choices to answer (See interrogatories #35-38 for an example):

Ofc. Turpin	YES _____	NO _____	UNKNOWN _____	DID NOT ANSWER _____
Ofc. Rogers	YES _____	NO _____	UNKNOWN _____	DID NOT ANSWER _____

1. On October 30, 2017, at the intersection of Pacific Highway South and S. 316th St. in Federal Way, WA did Robert Lightfeather alert Joseph Kangethe and Warren Nyanjui that smoke was coming from their vehicle?

YES _____ NO _____ UNKNOWN _____
2. Did Joseph Kangethe pull into the Elephant Car Wash to investigate the source of the smoke coming from his vehicle?
3. Did Robert Lightfeather pull into the Elephant Car Wash, exit his vehicle, and walk towards Joseph Kangethe and Warren Nyanjui?
4. Did Robert Lightfeather have what appeared to be a firearm/handgun in his hand when he contacted Joseph Kangethe?
5. Did Robert Lightfeather possess a .40 caliber Walther semi-automatic handgun, a firearm?
6. Did Robert Lightfeather and Joseph Kangethe talk for approximately 20 minutes?
7. Did Robert Lightfeather point a firearm at Joseph Kangethe’s head?
8. Did Sharon Mendiola call 911 to report a man pointing a gun at another man?
9. Did Officers Turpin and Rogers respond to a dispatch of a report of a “male pointing a gun at another male” at the Elephant Car Wash?
10. Were Officers Turpin and Rogers in clearly marked Federal Way Police uniforms?
11. Were Officers Turpin and Rogers in clearly marked Federal Way Police vehicles, with emergency lights activated?
12. When Officers Turpin and Rogers arrived on scene, did Robert Lightfeather turn towards the Officers?
13. Did Robert Lightfeather appear to rack a firearm?
14. Did Robert Lightfeather point a firearm in the direction of one of the officers?
15. Did Officer Rogers issue any order, command or warning to Mr. Lightfeather?

16. Did Officer Rogers fire his handgun at Robert Lightfeather?
17. Did a bullet fired by Officer Rogers strike Robert Lightfeather?
18. Did Officer Turpin move to the opposite side of his vehicle to improve the angle of an anticipated shot and get better cover?
19. Did Officer Turpin order Mr. Lightfeather to drop his gun?
20. At any time during this incident, did Robert Lightfeather drop his firearm in response to a command or commands given by a Federal Way Police Department Officer?
21. Did Officer Turpin fire his handgun at Robert Lightfeather?
22. Did a bullet fired by Officer Turpin strike Robert Lightfeather?
23. Did deadly force used by any of the following officers cause the death of Robert Lightfeather? (both)

Officer Turpin	YES _____	NO _____	UNKNOWN _____
Officer Rogers	YES _____	NO _____	UNKNOWN _____

24. Was the death of Robert Lightfeather caused by the use of deadly force against him by Officer Rogers or Officer Turpin or both Officers? (both)
25. Did Federal Way Police Department officers request medical aid within two minutes of Robert Lightfeather being struck by bullets?
26. Did Robert Lightfeather die within a manner of seconds of being struck by bullets?

INTERROGATORIES ABOUT CITY OF FEDERAL WAY POLICIES AND TRAINING:

27. Did either of the following officers have reason to believe Robert Lightfeather was acting in a manner that presented an imminent danger of serious physical harm to the officer or others? (both)
28. Did either of the following officers have reason to believe that a reasonably effective alternative to the use of deadly force existed? (both)
29. Did either of the following officers have reason to believe that he had probable cause to believe that Robert Lightfeather had committed or intended to commit a felony involving the infliction or threatened infliction of serious physical harm or death? (both)
30. Did a verbal warning precede either of the following Officers firing of their firearm? (both)
31. Was it feasible for any of the following officers to provide a verbal warning prior to firing that officer's firearm? (both)
32. Did the City of Federal Way Policy 1.3 USE OF FORCE apply to the actions of the following officers in this instance? (both)
33. If you found that the City of Federal Way Policy 1.3 Use of Force applied to the actions of any of the following officers during the course of this incident, did that officer comply with the policy? (both) (contingent)
34. If you found that the City of Federal Way Policy 1.3 Use of Force applied to the actions of either of the following officers during the course of this incident, were the actions of that officer consistent with the City of Federal Way training received by that officer? (both) (contingent)
35. Did the City of Federal Way Policy as to De-Escalation apply to the actions of the following officers in this instance? (both)

36. If you found that the City of Federal Way Policy Trainings as to De-Escalation applied to the actions of either of the following officers during the course of this incident, were the actions of that officer consistent with the City of Federal Way training received by that officer? (both) (contingent)

INTERROGATORIES ABOUT WHETHER ROBERT LIGHTFEATHER'S DEATH WAS OCCASIONED BY CRIMINAL MEANS

37. If you found that either of the officer's use of deadly force caused the death of Robert Lightfeather (Interrogatory # 23), as to either officer, was the use of deadly force by that officer justifiable as defined in Instruction Nos. _____? (both)(contingent)

Ofc. Turpin YES _____ NO _____ UNKNOWN _____ DID NOT ANSWER _____
Ofc. Rogers YES _____ NO _____ UNKNOWN _____ DID NOT ANSWER _____

38. If you answered "NO" to the Interrogatory # 35 as to either officer (that the officer's use of deadly force against Robert Lightfeather was not justifiable), was the use of deadly force by that officer done with malice, as defined in Instruction No. [Malice definition]? (both) (contingent)

Ofc. Turpin YES _____ NO _____ UNKNOWN _____ DID NOT ANSWER _____
Ofc. Rogers YES _____ NO _____ UNKNOWN _____ DID NOT ANSWER _____

39. If you answered "NO" to the Interrogatory # 35 (that the officer's use of deadly force against Robert Lightfeather was not justifiable), was the use of deadly force by that officer not in good faith as defined in Instruction No. [Good Faith definition]? (both) (contingent)

Ofc. Turpin YES _____ NO _____ UNKNOWN _____ DID NOT ANSWER _____
Ofc. Rogers YES _____ NO _____ UNKNOWN _____ DID NOT ANSWER _____

40. If you found that either officer's use of deadly force against Robert Lightfeather was not justifiable (Interrogatory #37), and was committed with malice (Interrogatory #38) or not in good faith (Interrogatory #39, did that officer cause the death of Robert Lightfeather by criminal means? (both) (contingent)

Ofc. Turpin YES _____ NO _____ UNKNOWN _____ DID NOT ANSWER _____
Ofc. Rogers YES _____ NO _____ UNKNOWN _____ DID NOT ANSWER _____

Dated this _____ day of _____, 2022.

Panel Member

Panel Member

Panel Member

Panel Member

Panel Member

Panel Member