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7 KING COUNTY DEPARTMENT OF EXECUTIVE SERVICES INQUEST PROGRAM

8 In re INQUEST INTO THE DEATH OF
9 CHARLEENA LYLES,

NO. 517IQ9301

PLAINTIFF'S SUMMARY OF
PROPOSED WITNESSES

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11 Plaintiffs request the following witnesses be called at trial for the reasons stated herein:

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13 1. Former Chief Carmen Best

14 Chief Carmen Best investigated the incident and disciplined Officer Anderson for violating
15 Department Manual Policy 8.300(3) which requires that "officers who have been trained and
16 certified to carry a CEW (Taser) and have been issued one must carry it during their shift." Chief
17 Best's testimony will aid the inquest panel in determining the gravity of Officer Anderson's
18 disobedience and applicability to the incident.

19
20 2. Detective Biggs

21 Detective Biggs was the primary detective involved in the crime scene investigation. She
22 conducted the immediate scene walkthrough with Officer McNew. Detective Biggs placed the
23 placards where Officer McNew believed he was when he first saw the knife, where he believed
24 Ms. Lyles was when he first saw the knife, and where he and Ms. Lyles were when shots were
fired. Detective Biggs was not able to engage in this same protocol with Officer Anderson who
had left the scene. Detective Biggs took photos of the scene and observed KCME Dr. Mazrim's
preliminary examination of Charleena's body at the scene. She then returned to the CSI
processing facility where she secured evidence. Sergeant Grinstead simply responded to the
scene and supervised. Detective Biggs's testimony will aid the inquest panel in determining the
data points used to re-create what happened the day of the incident.

3. Officer Oliver Murphy

1 Officer Murphy was called to Solid Ground after the shooting. Upon arrival he found officers
2 performing CPR. He exited the apartment and went to look for additional medical supplies.
3 When he returned, he observed two wounds on Ms. Lyle's body and packed the wounds with
4 gauze. He held pressure on the wounds while officers continued chest compressions and CPR.
5 He was there before Seattle Fire arrived and was present when her body was moved to the
hallway. He observed the scene and saw one bullet and one knife. Officer Murphy's testimony
will aid the inquest panel in determining the condition of Ms. Lyles after the shooting and
whether Officers Anderson and McNew rendered aid to her as soon as reasonably possible.

6 4. Kerry Zieger

7 Officer Kerry Zieger was the taser coordinator at the training unit for the Seattle Police
8 Department at the time of the incident. He was contacted by the Force Investigation Team about
9 whether Officer Anderson violated SPD taser policy. His knowledge includes what trainings
10 officers are required to complete; how tasers are used, in what circumstances, and their success
11 rate; how officers assess threat; the requirement for how many officers should be present if a
12 taser may need to be used (the 3S model); the importance and requirement of de-escalation.

13 By contrast, Officer Leroy Outlaw was not the taser coordinator at the time of the incident and
14 had no involvement in the FIT investigation. Officer Zieger's testimony will aid the inquest
15 panel in determining whether the use of force was reasonable and lawful pursuant to SPD policy.

16 5. Lt. Dan Nelson – CIT –

17 Lt. Dan Nelson has specific knowledge related to SPD's crisis intervention training and policies.
18 He reviewed the incident as part of the force review process. Lieutenant Nelson's testimony will
19 aid the inquest panel in determining whether Officers Anderson and McNew's actions were
20 consistent with SPD's de-escalation and use of force policies.

21 6. Officer Derek Norton

22 Officer Norton responded to Solid Ground after report of shots were fired. When he arrived
23 Officer Shickler handed him one of the children. He took the child outside and returned back to
24 the residence and helped assist SPD and SFD personnel enter the building. He stood with friends
and family while they waited for CPS to arrive to transfer custody of the children. He then
cleared the scene. Officer Norton's testimony will aid the inquest panel in understanding the
scene and its aftermath.

7. Lt. Cory Simmons

Lt. Cory Simmons is the initial incident commander for the June 18, 2017, incident. He was the
first to arrive on scene. He received briefing from Officer McNew that aid was not immediately
rendered. He ordered that all officers turn off their ICV. He was involved in gathering video

1 from Solid Ground’s hallway video cameras and securing evidence. Lieutenant Simmons’
2 testimony will aid the inquest panel in determining what happened that day, and whether
Officers Anderson and McNew rendered aid to Ms. Lyles as soon as reasonably possible

3 8. Sergeant David Sylvester

4 Sergeant Sylvester was involved in crime scene security. When he arrived, he observed SFD
5 rendering aid to Ms. Lyles. He was there when SFD declare Charleena deceased. He secured the
6 building and managed crime scene security as investigation units responded. He assisted CSI and
7 was a “stand in for perspective” photographs due to the absence of Officer Anderson. He secured
the apartment after CSI finished their investigation. Sergeant Sylvester’s testimony will aid the
inquest panel in determining how SPD secured the scene, data points and subsequently
investigated the incident.

8 9. Bellen Drake (Solid Ground)

9 Bellen Drake was an employee at Solid Ground at the time Ms. Lyles resided there. She was
10 present during the June 5 incident, was present when Ms. Lyles returned after being at Mental
Health Court, and was concerned about her mental health condition. She knew specifics about
11 Ms. Lyle’s recent mental health history including an incident the end of May at the playground
where she acted out with paranoid delusions. She was will also testify about Solid Ground’s
12 relationship with SPD – that she informed SPD of Ms. Lyles’ medical health history and
concerns she had prior to the instant shooting.

13
14 Dated this 20th day of May, 2022.

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16
17 /s/ Karen Koehler

Karen K. Koehler, WSBA #15325

Edward H. Moore, WSBA #41584Tarr

Melanie Nguyen, WSBA #51724

STRITMATTER KESSLER KOEHLER MOORE

CERTIFICATION

I hereby certify that on May 20, 2022, I delivered a copy of the document to which this certification is attached for delivery to all parties of record as follows:

<p>Inquest Program Personnel Hon. Michael Spearman Claire Thornton Claire.Thornton@kingcounty.gov Dee Sylve Dee.Sylve@kingcounty.gov Matt Anderson Matt.Anderson@kingcounty.gov DES-Dept. of Executive Services 401 5th Ave., suite 131 Seattle, WA 98104</p>	<p><input type="checkbox"/> U.S. Mail (First Class and Certified) <input type="checkbox"/> Fax <input type="checkbox"/> Process Server <input checked="" type="checkbox"/> Electronic Delivery</p>
<p>Ghazal Sharifi, WSBA 47750 Ghazal.Sharifi@seattle.gov Rebecca Boatright Rebecca.Boatright@Seattle.gov Rebecca Widen Rebecca.widen@seattle.gov Seattle City Attorney's Office 701 5th Ave. Suite 2050 Seattle, WA 98104-7097 Counsel for City of Seattle re Inquest</p>	<p><input type="checkbox"/> U.S. Mail (First Class and Certified) <input type="checkbox"/> Fax <input type="checkbox"/> Process Server <input checked="" type="checkbox"/> Electronic Delivery</p>
<p>Ted Buck, WSBA #22029 tbuck@freybuck.com Karen Cobb, WSBA #34958 kcobb@freybuck.com Frey Buck, PS 1200 5th Ave, Suite 1900 Seattle, WA 98101 Counsel for Officers Anderson and McNew</p>	<p><input type="checkbox"/> U.S. Mail (First Class and Certified) <input type="checkbox"/> Fax <input type="checkbox"/> Process Server <input checked="" type="checkbox"/> Electronic Delivery</p>

/s/ Anne Roberson
 Anne Roberson
 anner@stritmatter.com