

Department of Executive Services

Inquest Program

401 Fifth Avenue, Suite 135 Seattle, WA 98104

206-477-6191

TTY Relay 711

Webpage: kingcounty.gov/inquests Email: Inquests@kingcounty.gov

INQUEST INTO THE DEATH OF CHARLEENA CHAVON LYLES # 517IQ9301

INTERROGATORIES TO THE INQUEST JURY

DATED	day of July, 2022.			
		$\overline{\mathbf{N}}$	Michael Spearman	
		I	nquest Administrato	r

INTERROGATORIES ABOUT THE CIRCUMSTANCES AND CAUSES OF THE DEATH OF CHARLEENA LYLES

•		18, 2017, at approximately 8:55am, did Charleena Lyles call 911 er apartment?
YES	NO	UNKNOWN
•		le Police Department Officer Anderson arrive at Ms. Lyles's sponse to her call to 911?
YES	NO	UNKNOWN
•	-	val did Officer Anderson review an Officer Safety Caution cident at Ms. Lyles's apartment on June 5, 2017?
YES	NO	UNKNOWN
· ·		Officer Safety Caution notice advise Officer Anderson that on had threatened officers with a knife?
YES	NO	UNKNOWN
		er Anderson review police report(s) arising from an incident at a June 5, 2017?
YES	_ NO	UNKNOWN
•	-	olice report(s) advise Officer Anderson that on June 5, 2017, Msteers with a large pair of scissors?
YES	NO	UNKNOWN
		olice report(s) suggest to Officer Anderson that on June 5, 2017, ptoms consistent with mental instability and delusions?
YES	NO	UNKNOWN
2017 incid	dent that Ms. L	cer Anderson alerted by the police report(s) from the June 5, yles might exhibit symptoms of mental instability and delusions
YES	NO	UNKNOWN
		er Anderson request a back-up officer because of what he read acident?
YES	NO	UNKNOWN
	rogatory No apartment YES	rogatory No. 2: Did Seatt apartment building in reserved YES NO

Inter		o. 10: Did Off les' apartment	icer McNew respond to the call for a back-up officer and arrive building?
	YES	NO	UNKNOWN
Inter		o. 11: Was Officer?	ficer McNew certified as a crisis intervention trained (CIT)
	YES	NO	UNKNOWN
Inter	•		icer Anderson discuss what he learned about the June 5, 2017, New before approaching Ms. Lyles' apartment building?
	YES	NO	UNKNOWN
Inter	rogatory N Caution?	o. 13: Did Off	icer McNew ask Officer Anderson if Ms. Lyles had a Mental
	YES	NO	_ UNKNOWN
Inter	rogatory N	o. 14: Did Off	icer Anderson respond, "no"?
	YES	NO	UNKNOWN
Inter	Officer M	cNew to be aw	icer Anderson's description of the June 5, 2017 incident cause ware that on June 5, 2017, Ms. Lyles exhibited symptoms astability and delusions?
	YES	NO	UNKNOWN
Inter	June 5, 20		ficer McNew alerted by Officer Anderson's description of the at Ms. Lyles might exhibit symptoms of mental instability and 17?
	YES	NO	UNKNOWN
Inter			they entered the apartment did the officers make a plan that after nt, they would not allow Ms. Lyles to get behind them?
	YES	NO	UNKNOWN
Inter	•		they entered the apartment did the officers also make a plan that artment, they would not allow Ms. Lyles get between them and
	YES	NO	UNKNOWN

· ·		d officers with a large pair of scissors on June 5, 2017?
YES	NO	UNKNOWN
Ms. Lyles	had exhibited	plan based, in whole or in part, on the officers' awareness that symptoms consistent with mental instability and delusions on
YES	NO	UNKNOWN
rogatory No	21: Did Ms.	Lyles allow the officers entry into her apartment?
YES	_ NO	UNKNOWN
•		s. Lyles wearing a knee-length down coat when the officers
YES	_ NO	UNKNOWN
•		icer Anderson see an infant and a young child in the living room
YES	_ NO	UNKNOWN
•		icer McNew see an infant and a young child in the living room
YES	NO	UNKNOWN
•		Lyles point out where the reported stolen property had been om?
YES	NO	UNKNOWN
•		Lyles lead the officers to a back bedroom and point out from a property had been taken?
YES	NO	UNKNOWN
		Lyles lead the officers back to the kitchen area of the
YES	NO	UNKNOWN
	Ms. Lyles YES rogatory No Ms. Lyles June 5, 20 YES rogatory No after he en	Ms. Lyles had threatened YES NO rogatory No. 20: Was the Ms. Lyles had exhibited June 5, 2017? YES NO rogatory No. 21: Did Ms. YES NO rogatory No. 22: Was Ms entered the apartment? YES NO rogatory No. 23: Did Off after he entered? YES NO rogatory No. 24: Did Off after he entered? YES NO rogatory No. 25: Did Ms. taken from the living root YES NO rogatory No. 26: Did Ms. where the reported stoler YES NO rogatory No. 26: Did Ms. where the reported stoler YES NO rogatory No. 27: Did Ms. apartment?

Inter	•	_	the course of his interaction with Ms. Lyles, did Officer yles moving her hands in and out of her coat pockets?
	YES	NO	UNKNOWN
Inter	•	_	the course of his interaction with Ms. Lyles, did Officer McNew ng her hands in and out of her coat pockets?
	YES	NO	UNKNOWN
Inter	rogatory No	o. 30: Did Off	icer Anderson ask Ms. Lyles to stop putting her hands in her
	YES	NO	_ UNKNOWN
Inter	rogatory No	o. 31: Did Off	icer McNew ask Ms. Lyles to stop putting her hands in her
	YES	_ NO	UNKNOWN
Inter	•		turning to the kitchen area of the apartment, did Ms. Lyles stande of the end of the peninsula counter?
	YES	NO	_ UNKNOWN
Inter	_		turning to the kitchen area of the apartment, did Officer kitchen side of the end of the peninsula counter?
	YES	NO	UNKNOWN
Inter	rogatory No Anderson		icer McNew take a position inside the kitchen to Officer
	YES	NO	UNKNOWN
Inter	rogatory No counters?	o. 35: Were th	ere several knives visible at various places on both kitchen
	YES	_ NO	UNKNOWN
Inter	rogatory No	o. 36: Did Off	icer Anderson see the knives on the counters?
	YES	NO	UNKNOWN
Inter	rogatory No	o. 37: Did Off	ficer McNew see the knives on the counters?
	YES	NO	UNKNOWN

Inter	•		•	calmly and cl IcNew about t	early answering questions from both he burglary?	
	Officer And	erson:	YES	NO	UNKNOWN	
	Officer McN	lew:	YES	NO	UNKNOWN	
Inter	rogatory No. 3			nderson taking	notes and unable to maintain constant eye	
	YES	NO_	U	NKNOWN _		
Inter	rogatory No. 4 observing M			Anderson was	talking to Ms. Lyles, was Officer McNew	
	YES	NO _	U	NKNOWN _		
Inter	•				talking to Ms. Lyles at the end of the w turned away from Officer Anderson and	
	YES	NO_	U	NKNOWN _		
Inter	rogatory No. 4 Lyles was he			McNew was to	urned away from Officer Anderson and Ms.	
	YES	NO _	U	NKNOWN _		
Inter	rogatory No. 4		Ms. Lyles	demeanor sud	denly change from cooperative to hostile	
	YES	NO_	U	NKNOWN _		
Inter	rogatory No. 4	44: Did	Ms. Lyles	suddenly disp	ay a knife in her right hand?	
	YES	NO _	U	UNKNOWN		
Inter				les's display o	of a knife, did Officer Anderson reasonably the officers?	
	YES	NO _	U	NKNOWN _		
Inter	•		-	rles's display o ose a threat to	of a knife, did Officer McNew reasonably the officers?	
	YES	NO_	U	NKNOWN _		

Interrogatory No. abdomen?	47: Did Ms	. Lyles suddenly thrust a knife towards Officer Anderson's
YES	NO	UNKNOWN
Interrogatory No.	48: Did Off	icer Anderson jump back to the pantry door avoid being stabbed?
YES	NO	_ UNKNOWN
Interrogatory No. line of Ms. Lyles's		icer Anderson then move to the entryway to his left to get off-
YES	NO	UNKNOWN
Interrogatory No. Anderson?	50: Did Off	icer McNew see Ms. Lyles display a knife and thrust it at Officer
YES	NO	UNKNOWN
Interrogatory No.	51: Did the	knife in Ms. Lyles's hand contact Officer Anderson?
YES	NO	_ UNKNOWN
Interrogatory No.	52: Did Off	icer Anderson get on the radio and request back up?
YES	NO	UNKNOWN
Interrogatory No.	53: Did Off	icer Anderson draw his firearm and order Ms. Lyles to get back?
YES	NO	_ UNKNOWN
0 •		. Lyles comply with Officer Anderson's order to get back and ng room side of the apartment?
YES	NO	UNKNOWN
Interrogatory No. Anderson and Ms.		icer McNew see any part of this interaction between Officer
YES	NO	UNKNOWN
•	56: Did Ms kitchen penin	. Lyles then turn toward Officer McNew from the living room sula?
YES	NO	UNKNOWN

0 •	nd request help?	icer McNew get on the radio, report a woman armed with two
YES	NO	UNKNOWN
Interrogatory N	No. 58: Did Ms.	Lyles raise a knife over her head with her right hand?
YES	NO	UNKNOWN
		icer McNew believe that Ms. Lyles was going to throw the knife om side of the kitchen peninsula?
YES	NO	UNKNOWN
Interrogatory N him?	No. 60: Did Off	icer McNew duck down to avoid the knife if it was thrown at
YES	NO	UNKNOWN
•	No. 61: When Cone in each hand	Officer McNew next observed Ms. Lyles was she holding two?
YES	NO	UNKNOWN
	No. 62: When Ompointed at Ms	Officer McNew drew his firearm, did Officer Anderson also haves. Lyles?
YES	NO	UNKNOWN
Interrogatory N	No. 63: Did Ms.	Lyles say to the officers, words to the effect of "Do it."?
YES	NO	UNKNOWN
Interrogatory N	No. 64: Did Off	icer McNew yell to Officer Anderson, "Taser!"?
YES	NO	UNKNOWN
	No. 65: Did Ms. r, motherfucker	Lyles say to the officers, words to the effect of "You can't do s"?
YES	NO	UNKNOWN
Interrogatory N	No. 66: Did Off	icer Anderson respond that he didn't have a Taser?
YES	NO	UNKNOWN

		cNew's movements on the kitchen side of the peninsula?
YES	NO	UNKNOWN
	No. 68: Did Ms. vards Officer Mcl	Lyles move from the edge of the peninsula on the living room New?
YES	NO	UNKNOWN
	No. 69: As she rhand pointed at C	moved towards Officer McNew, was Ms. Lyles holding one knife Officer McNew?
YES	NO	UNKNOWN
		s. Lyles had begun approaching Officer McNew, could he move at getting within lunging distance of Ms. Lyles?
YES	NO	UNKNOWN
Interrogatory	No. 71: Did Ms.	Lyles comply with Officer McNew's orders to get back?
YES	NO	UNKNOWN
Interrogatory 1	No. 72: Did Off	icer McNew draw his firearm and point it at Ms. Lyles?
YES	NO	UNKNOWN
Interrogatory :	No. 73: Did Off	icer Anderson fire his handgun four times at Ms. Lyles?
YES	NO	UNKNOWN
		fficer Anderson first ordered Ms. Lyles to get back, did he give to get back before he fired his handgun?
YES	NO	UNKNOWN
Interrogatory :	No. 75: Did Off	icer McNew fire his handgun three times at Ms. Lyles?
YES	NO	UNKNOWN
Interrogatory he fired his han		icer McNew give multiple orders to Ms. Lyles to get back before
YES	NO	UNKNOWN

Interr	•		Lyles's initial compliance with Officer Anderson's order to apply with any additional orders to get back?
	YES	NO	UNKNOWN
Interr	•		me Ms. Lyles displayed a knife until just after shots were n and Officer McNew able to see each other?
	YES	NO	UNKNOWN
Interr	-		Officer Anderson fired his handgun, was he aware of where s's children were?
	YES	NO	UNKNOWN
Interr	•		Officer McNew fired his handgun, was he aware of where in children were?
	YES	NO	UNKNOWN
Interr			r McNew announce over the radio within seconds of shots vas down and medics were needed?
	YES	NO	UNKNOWN
Interr	•		Officer Anderson and Officer McNew fired their handguns, g room at risk of being struck by a bullet?
	YES	NO	UNKNOWN
Interr	ogatory No. 8 open?	33: At the time	shots were fired, was the front door to Ms. Lyles's apartmen
	YES	NO	UNKNOWN
Interr	•		cer Anderson shot his firearm at Ms. Lyles, was he standing Lyles's apartment?
	YES	NO	UNKNOWN
Interr	•		cer Anderson shot his firearm at Ms. Lyles, was he standing Lyles's apartment?
	YES	NO	UNKNOWN

INTERROGATORIES TO THE INQUEST JURY

Inter	rogatory No. 8 others presen				y warn Ms. Lyles, Officer McNew, or dgun?	
	YES	NO _	UN	IKNOWN		
Inter					hooting a reasonable amount of time to esent to heed the warning?	
	YES	NO _	UN	KNOWN		
Inter	rogatory No. 8				that giving a verbal warning would	
	YES	NO _	UN	IKNOWN		
Inter	rogatory No. 8 others presen			-	warn Ms. Lyles, Officer Anderson, or dgun?	
	YES	NO _	UN	IKNOWN		
Inter					poting a reasonable amount of time to all to heed the warning?	low
	YES	NO _	UN	IKNOWN		
Inter	rogatory No. 9				hat giving a verbal warning would	
	YES	NO _	UN	IKNOWN		
Inter	rogatory No. 9 force used by				asonably effective alternative to the dea McNew?	dly
	YES	NO _	UN	IKNOWN		
Inter					or Officer McNew fired his handgun at ctive alternative to the use of deadly force	
	Officer Ande	erson	YES	_ NO	UNKNOWN	
	Officer McN	ew	YES	NO	UNKNOWN	

Interr	0 0		,	defined in Instruction Nos. 11 and 12.				
	Officer Anderson	YES	NO	UNKNOWN				
	Officer McNew	YES	NO	UNKNOWN				
	ogatory No. 95: Did l Lyles?	oullets fired by	Officer Anders	son or Officer McNew strike Ms.				
	Officer Anderson	YES	NO	UNKNOWN				
	Officer McNew	YES	NO	UNKNOWN				
Interr	ogatory No. 96: Did of medical aid for Ms. L			IcNew request or render ssible?				
	Officer Anderson	YES	NO	UNKNOWN				
	Officer McNew	YES	NO	UNKNOWN				
Interr	Interrogatory No. 97: Did Charleena Lyles die in Seattle, King County, Washington on June 18, 2017?							
	YES NO	UNKN	NOWN					
Interr	Interrogatory No. 98: Was Ms. Lyles's death the result of the use of deadly force against her by Officer Anderson or Officer McNew?							
	Officer Anderson	YES	NO	UNKNOWN				
	Officer McNew	YES	NO	UNKNOWN				

INTERROGATORIES ABOUT SPD POLICIES AND TRAINING

Interrogatory No. 99: Did SPD Policy 5.140 – Bias-Free Policing apply to the actions of the following officers in this incident?							
	Officer Anderson	YES	NO	UNKNOWN			
	Officer McNew	YES	NO	UNKNOWN			
If you	If you found that SPD Policy 5.140 – Bias-Free Policing did not apply to Officer Anderson or Officer McNew, please skip Interrogatories 100 and 101 as to that officer.						
Interr		Collowing office	•	40 – Bias-Free Policing applied to the ourse of this incident, did that officer			
	Officer Anderson	YES	NO	UNKNOWN			
	Officer McNew	YES	NO	UNKNOWN			
Interrogatory No. 101: If you found that SPD Policy 5.140 – Bias-Free Policing applied to the actions of any of Officer Anderson or Officer McNew during the course of this incident, were the actions of that officer consistent with SPD training received as to that policy?							
	Officer Anderson	YES	NO	UNKNOWN			
	Officer McNew	YES	NO	UNKNOWN			
Interrogatory No. 102: Did SPD Policy 8.000 – Use of Force Core Principles (Sections 2, 3 and 4) apply to the actions of the following officers in this incident?							
	Officer Anderson	YES	NO	UNKNOWN			
	Officer McNew	YES	NO	UNKNOWN			
If you found that SPD Policy 8.000 – Use of Force Core Principles (Sections 2, 3 and 4) did not apply to Officer Anderson or Officer McNew, please skip Interrogatories 103 and 104 as to that officer.							

Interrogatory No. 103: If you found that SPD Policy 8.000 – Use of Force Core Principles (Sections 2, 3 and 4) applied to the actions of any of the following officers during the course of this incident, did that officer comply with the policy?							
	Officer Anderson	YES	NO	UNKNOWN			
	Officer McNew	YES	NO	UNKNOWN			
Interr	Interrogatory No. 104: If you found that SPD Policy 8.000 - Use of Force Core Principles (Sections 2, 3 and 4) applied to the actions of any of Officer Anderson or Officer McNew during the course of this incident, were the actions of that officer consistent with SPD training received as to that policy?						
	Officer Anderson	YES	NO	UNKNOWN			
	Officer McNew	YES	NO	UNKNOWN			
Interr	ogatory No. 105: Did following officers in t		.100 – De-Esca	lation apply to the actions of the			
	Officer Anderson	YES	NO	UNKNOWN			
	Officer McNew	YES	NO	UNKNOWN			
If you	If you found that SPD Policy 8.100 – De-Escalation did not apply to Officer Anderson or Officer McNew, please skip Interrogatories 106 and 107 as to that officer.						
Interrogatory No. 106: If you found that SPD Policy 8.100 – De-Escalation applied to the actions of any of the following officers during the course of this incident, did that officer comply with the policy?							
	Officer Anderson	YES	NO	UNKNOWN			
	Officer McNew	YES	NO	UNKNOWN			
Interrogatory No. 107: If you found that SPD Policy 8.100 – De-Escalation applied to the actions of any of Officer Anderson or Officer McNew during the course of this incident, were the actions of that officer consistent with SPD training received as to that policy?							
	Officer Anderson	YES	NO	UNKNOWN			
	Officer McNew	YES	NO	UNKNOWN			

Interr	•		•	,	f Force (Sections 1, 3, 4 and 6) ap in this incident?	ply to	
	Officer Ande	rson	YES	NO	UNKNOWN		
	Officer McNe	ew	YES	NO	UNKNOWN		
If you					d 6) did not apply to Officer Anders 109 and 110 as to that officer.	son or	
Interr	Interrogatory No. 109: If you found that SPD Policy 8.200 – Use of Force (Sections 1, 3, 4 and 6) applied to the actions of Officer Anderson or Officer McNew during the course of this incident, did that officer comply with the policy?						
	Officer Ande	rson	YES	NO	UNKNOWN		
	Officer McNe	ew	YES	NO	UNKNOWN		
Interr	Interrogatory No. 110: If you found that SPD Policy 8.200 – Use of Force (Sections 1, 3, 4 and 6) applied to the actions of Officer Anderson or Officer McNew during the course of this incident, were the actions of that officer consistent with SPD training received as to that policy?						
	Officer Ande	rson	YES	_ NO	UNKNOWN		
	Officer McNe	ew	YES	NO	UNKNOWN		
Interrogatory No. 111: Did SPD Policy 8.300-POL-3 - Use of Force – CEW/CONDUCTED ELECTRICAL WEAPONS (TASER) (Section 3) apply to the actions of Officer Anderson in this incident?							
	YES	NO	UN	KNOWN	_		
If you found that SPD Policy 8.300-POL-3 - Use of Force – CEW/CONDUCTED ELECTRICAL WEAPONS (TASER) (Section 3) did not apply to Officer Anderson, please skip Interrogatories 112 and 113.							
Interr	CEW/COND	UCTÉL	ELECTR	ICAL WEAP	3.300-POL-3 - Use of Force – ONS (TASER) (Section 3) applied e of this incident, did he comply wi		
	YES	NO	UN	KNOWN	_		

CEW/CONDUCTE	ED ELECT r Anderson	RICAL WEAL during the cour	8.300-POL-3 - Use of Force – PONS (TASER) (Section 3) applies of this incident, were his action t policy?	
YES NO _	U	NKNOWN		
			4 – Use of Force - Firearms (Secicer McNew in this incident?	tion 7)
Officer Anderson	YES	NO	UNKNOWN	
Officer McNew	YES	NO	UNKNOWN	
•	•		orce - Firearms (Section 7) did r lease skip Interrogatories 115 and	
	to the action	s of Officer An	8.300-POL-4 – Use of Force - F derson or Officer McNew during with the policy?	
Officer Anderson	YES	NO	UNKNOWN	
Officer McNew	YES	NO	UNKNOWN	
(Section 7) applied t	to the action nt, were the	s of Officer An	8.300-POL-4 – Use of Force - F derson or Officer McNew during officer consistent with SPD train	the
Officer Anderson	YES	NO	UNKNOWN	
Officer McNew	YES	NO	UNKNOWN	
Interrogatory No. 117: Di Officer McNew in th			isis Intervention apply to the acti	ons of
YES NO _	U.	NKNOWN		
If you found that SPD Polic please skip Into			ation did not apply to Officer McN	New,

Interr		•	w during the course of this incident, did he comply with the
	YES	NO	UNKNOWN
Interr	the actions of	Officer McNe	and that SPD Policy 16.110 – Crisis Intervention applied to w during the course of this incident, were his actions g received as to that policy?
	YES	NO	UNKNOWN

INTERROGATORIES ABOUT WHETHER CHARLEENA LYLES' DEATH WAS OCCASIONED BY CRIMINAL MEANS

Interr	· .	h of Charleena	Lyles, was the	on's or Officer McNew's use of deadly use of deadly force by that officer?			
	Officer Anderson	YES	NO	UNKNOWN			
	Officer McNew	YES	NO	UNKNOWN			
and sig	If you answered "YE gn and return this form	_	tory 120, pleas	e skip the remaining interrogatories			
Interr	Interrogatory No. 121: If you found that the use of deadly force by Officer Anderson or Officer McNew against Charleena Lyles was not justifiable, was the use of deadly force by such officer done with malice as defined in Instructions No. 11 and 12?						
	Officer Anderson	YES	NO	UNKNOWN			
	Officer McNew	YES	NO	UNKNOWN			
sign ar	If you answered "NO nd return this form.	" to Interrogate	ory 121, please	skip the remaining interrogatories and			
Interr	Officer McNew again	nst Charleena L	yles was not ju	ly force by Officer Anderson or astifiable, was the use of deadly force uctions No. 11 and 12?			
	Officer Anderson	YES	NO	UNKNOWN			
	Officer McNew	YES	NO	UNKNOWN			
sign ar	If you answered "NO nd return this form.	" to Interrogate	ory 122, please	skip the remaining interrogatory and			

Interrogatory No. 123: If you found that the use of deadly force by Officer Anderson or Officer McNew against Charleena Lyles was not justifiable, and was committed with malice or not in good faith, did that officer cause the death of Charleena Lyles by criminal means as defined in Instruction No. 22?					
Officer Anderson	YES	NO	UNKNOWN		
Officer McNew	YES	NO	UNKNOWN		
DATED this day of _	, 2022.				
Panel Foreperson					
Panel Member		Panel M	ember		
Panel Member		Panel M	ember		
Panel Member		Panel M	ember		