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6 KING COUNTY DISTRICT COURT OF WASHINGTON
7 WEST DIVISION

8 INQUEST INTO THE DEATH OF:
9 DAMARIUS DEMONTA BUTTS,
10 Defendant.
11

No. 517IQ8013

DISCOVERY DEMAND

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13 **TO:** Ghazal Sharifi and Erika Evans, City of Seattle representing the Seattle Police Department

14 **CC:** Ted Buck and Evan Bariault, attorneys for Officers Elizabeth Kennedy, Hudson Kang,
15 Chris Myers, Joshua Vaga, and Xavier Gordillo; Matthew Anderson, King County Inquest
16 Administrator Assistant.
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18 DISCOVERY DEMAND

19 Pursuant to representation of the mother of Damarius Butts, the undersigned counsel
20 request that the Seattle Police Department, provide the following records. This demand is made
21 pursuant to EO, A1, § 4 and Civil Rule 26.

22 (1) Relevant records outlining when each of the following officers was issued body worn
23 video:

24 (a) C. Bandel, #8367

1 (b) J. Briskey, #6824

2 (c) M. Clark, #6824

3 (d) C. Gordillo, #7651

4 (e) H. Kang, #7759

5 (f) E. Kennedy, #7725

6 (g) A. Merritt, #7673

7 (h) C. Myers, #5452

8 (i) J. Vaaga, #8397

9 (2) Relevant records regarding each of the following officer's firearms certifications and
10 renewals :

11 (a) C. Bandel, #8367

12 (b) J. Briskey, #6824

13 (c) M. Clark, #6824

14 (d) C. Gordillo, #7651

15 (e) H. Kang, #7759

16 (f) E. Kennedy, #7725

17 (g) A. Merritt, #7673

18 (h) C. Myers, #5452

19 (i) J. Vaaga, #8397

20 (3) Relevant records regarding each of the following officer's assigned firearms & Tasers

21 (a) C. Bandel, #8367

22 (b) J. Briskey, #6824

23 (c) M. Clark, #6824

1 (d) C. Gordillo, #7651

2 (e) H. Kang, #7759

3 (f) E. Kennedy, #7725

4 (g) A. Merritt, #7673

5 (h) C. Myers, #5452

6 (i) J. Vaaga, #8397

7 (4) SPD policy regarding ongoing training requirements in order to be an officer in good
8 standing with SPD, including general good standing to be an officer and for firearms
9 certification

10 (5) DNA results and/or status of DNA testing (as ordered by WSP in Bates 852)

11 (6) SPD new officer handbook and/or new hire training requirements (with underlying
12 documents)

13 (7) Confirmation that the flash bang used was via KCSO

14 (8) Confirmation that the K9 used with SPD

15 (a) Training records for K9 and handler specific to duties and dog handler.

16 (9) All materials held by SPD subject to *Brady* disclosure for the following officers:

17 (a) C. Bandel, #8367

18 (b) J. Briskey, #6824

19 (c) M. Clark, #6824

20 (d) C. Gordillo, #7651

21 (e) H. Kang, #7759

22 (f) E. Kennedy, #7725

23 (g) A. Merritt, #7673

- 1 (h) C. Myers, #5452
- 2 (i) J. Vaaga, #8397
- 3 (10) OPA files for each of the following officers:
- 4 (a) C. Bandel, #8367
- 5 (b) J. Briskey, #6824
- 6 (c) M. Clark, #6824
- 7 (d) C. Gordillo, #7651
- 8 (e) H. Kang, #7759
- 9 (f) E. Kennedy, #7725
- 10 (g) A. Merritt, #7673
- 11 (h) C. Myers, #5452
- 12 (i) J. Vaaga, #8397
- 13 (11) All Other Use of Force reports related to firearm and/or Taser discharge for the
- 14 following officers:
- 15 (a) C. Bandel, #8367
- 16 (b) J. Briskey, #6824
- 17 (c) M. Clark, #6824
- 18 (d) C. Gordillo, #7651
- 19 (e) H. Kang, #7759
- 20 (f) E. Kennedy, #7725
- 21 (g) A. Merritt, #7673
- 22 (h) C. Myers, #5452
- 23 (i) J. Vaaga, #8397

1 (12) Training material records (like what is requested in Bates 3606 and provided thereafter
2 for) the following officers:

3 (a) C. Bandel, #8367

4 (b) M. Clark, #6824

5 (c) H. Kang, #7759

6 (13) The following materials, if available to SPD, for each of the following training
7 attended by the below-listened officer. If SPD did not create or retain the materials,
8 please note that and any relevant information.

9 (a) Officer Vaaga, #8397:

10 i. SPD – 2017 Crowd Control/Firearms and Tactics

11 ii. SPD – 2016 Crisis Intervention Training

12 iii. SPD – 2016 Integrated Tactics

13 iv. SPD – 2016 Post BLEA Defense Tactics #3 Impact Weapons

14 v. SPD – 2016 Post BLEA Field Training Program

15 vi. SPD – 2016 Post BLEA Firearms Day 4

16 vii. SPD – 2016 Post BLEA Firearms Day 3

17 viii. SPD – 2016 Post BLEA Firearms Day 2

18 ix. SPD – 2016 Post BLEA Firearms Day 1

19 x. SPD – 2016 Post BLEA Taser X2 Operator

20 xi. SPD – 2016 Post BLEA Introduction to Rapid Intervention

21 xii. SPD – 2016 Post BLEA Defensive Tactics #4 Ground Control &
22 Survival

23 xiii. SPD – 2016 Post BLEA Fundamental Principals
24

xiv. SPD – 2016 Post BLEA Defense Tactics #2 Counter Striking Trools

xv. SPD – 2016 Post BLEA Barricaded Person

xvi. SPD – 2016 Post BLEA De-Escalation

xvii. SPD – 2016 Post BLEA Contact/Cover Roles

xviii. SPD – 2016 Post BLEA Defense Tactics #1 Control & Cuffing

xix. SPD – 2016 Early Intervention Training

(b) Officer Merritt, #7673:

i. SPD – 2017 ACT Refresher – Entry

ii. SPD – 2017 Small Team Tactics

iii. SPD – 2017 Crown Control/Firearms and Tactics

iv. SPD – 2016 Crisis Intervention Training

v. SPD – 2016 Firearm Qualification and Less-lethal Recertification

vi. SPD – 2016 Tukwila Taser Use of Force Roll Call Training

vii. SPD – 2016 Bias-Based Complain Roll Call Training

viii. SPD – 2015 Tactical De-Escalation/Firearms Individual Skills

ix. SPC – 2014 Bias Free Policing

x. SPD – 2015 Advanced Crisis Intervention Training

xi. SPD – 2016 Early Intervention System

xii. SPD – 2016 Defense Tactics #1

(c) Officer Myers, #5452:

i. SPD – 2017 Crown Control/Firearms and Tactics

ii. SPD – 2016 Integrated Tactics

iii. SPD – 2016 Post BLEA Care Under Fire

- iv. SPD – 2016 Crisis Intervention Training
- v. SPD – 2016 Firearms Qualification and Less-lethal Recertification
- vi. SPD – 2015 Bias-Based Complained Roll Call Training
- vii. SPD – 2016 Tactical De-Escalation/Firearms Individual Skills
- viii. SPD – 2016 Biased Free Policing
- ix. SPD – 2015 Early Invention System
- x. SPD – 2015 Officer Sustainment – Use of Force
- xi. SPD – 2015 Defense Tactics #1

(d) Officer Kennedy, #7725:

- i. SPD – 2017 Frontline Investigations
- ii. SPD – 2017 Crown Control/Firearms and Tactics
- iii. SPD – 2017 Care Under Fire
- iv. SPD – 2016 Integrated Tactics
- v. SPD – 2016 Firearm Qualification and Less-lethal Recertification
- vi. SPD – 2016 Crisis Intervention Training Anti-Harassment and Anti-Discrimination
- vii. SPD – 2015 Handgun Qualification
- viii. SPD – 2015 Rapid Intervention Training
- ix. SPD – 2014 Bias Free Policing

(e) Officer Gordillo, #7651:

- i. SPD – 2017 Small Team Tactics
- ii. SPD – 2017 Crown Control/Firearms and Tactics
- iii. SPD – 2017 Care Under Fire

- iv. SPD – 2015 Tactical De-Escalation/Firearms Individual Skills

(f) Officer Brinksey, #6824:

ii. SPD – 2017 Care Under Fire

iv. SPD – 2016 Integrated Tactics

DATED this 18th day of June, 2019

Adrien Leavitt, WSBA #44451
Attorney for Mother of Damarius Butts