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6 KING COUNTY DEPARTMENT OF EXECUTIVE SERVICES
7 INQUEST PROGRAM

8 IN RE INQUEST INTO THE DEATH OF
9 ALBERT WAYNE FREDERICKS JR.

No. 17IQ427069

10 CITY OF SEATTLE'S PROPOSED
11 NARROWED LIST OF SEATTLE POLICE
DEPARTMENT TRAINING MATERIALS

12 Per the Inquest Administrator's October 12, 2022 order, the City hereby identifies its proposed
13 list of narrowed trainings. This list is based on the Administrator's previous orders regarding the scope
14 of this inquest dated 8/8/22 (training scope) and 9/8/22 (policy scope). The City would note that by
15 submitting this list, the City is not waiving its previous objections to the policy and training scope. The
16 City would also note that the training materials noted as "relevant" may contain portions that are
17 irrelevant.

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A. Bias Free Policing Trainings				
	Training	Include	Exclude	Explanation
19	1. 2016 Post BLEA Bias Free Policing (Hay)		X	The 2016 Post BLEA Bias Free Policing training materials are the same materials as 2014 Bias Free Policing.
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21	2. 2015 Post BLEA Bias Free Policing (Swartz)		X	The 2015 Post BLEA Bias Free Policing training materials are the same materials as 2014 Bias Free Policing.
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				videos (CITY_Fredericks_A_0000049 4-510), are not relevant or useful and should be excluded.
4.	Bias Free Policing (Jerome, Rogers)		X	There are no additional responsive materials beyond those identified in the prior entries, nos. 1-3.
B. Crisis Intervention/De-Escalation Trainings				
	Training	Include	Exclude	Explanation
1.	2016 Crisis Intervention Training (CIT) (Swartz, Hay, Rogers, Jerome, Oliverson) CITY_Fredericks_A_00000511-631	X-Portions		It is the City's position that the 2016 Crisis Intervention Training contains portions of relevant material.
2.	2016 Post BLEA Adv. CIT (Hay)		X	The training materials for 2016 Post BLEA Adv. CIT are the same materials used for the 2016 Crisis Intervention Training.
3.	2016 CIT (Jerome, Oliverson)		X	The training materials for 2016 CIT are the same materials used for the 2016 Crisis Intervention Training.
4.	CIT 2017 - 40hr (Hays)		X	There are no responsive materials to this request, because the training was put on by CJTC. It is the City's position that this training is not relevant and should be excluded. It is not an SPD training, and the City's designee will not be speaking to the content or the Involved Officer's compliance with any CJTC training.
5.	CIT 2016 - 40hr (Rogers, Jerome)		X	There are no responsive materials to this request, because the training was put on by CJTC. It is the City's position that this training is not relevant and should be excluded. It is not an SPD training, and the City's designee will not be speaking to

				the content or the Involved Officer's compliance with any CJTC training.
6.	2015 Post BLEA Adv. CIT (Swartz)		X	The training materials for 2015 Post BLEA Adv. CIT are the same materials as 2015 Adv. Cit. See note for following entry, no. 6.
7.	2015 Adv. CIT (Rogers, Jerome) CITY_Fredericks_A_00000632-734	X-Portions		It is the City's position that the 2015 Adv. CIT training contains portions of relevant material.
8.	2015 CIT (Oliverson)		X	The training materials for 2015 CIT are the same materials as 2015 Adv. CIT.
9.	2014 CIT (Jerome, Oliverson)		X	There are no responsive materials to this request, because the training was put on by CJTC. It is the City's position that this training is not relevant and should be excluded. It is not an SPD training, and the City's designee will not be speaking to the content or the Involved Officer's compliance with any CJTC training.
10.	2014 CIT - 40hr (Oliverson)		X	There are no responsive materials to this request, because the training was put on by CJTC. It is the City's position that this training is not relevant and should be excluded. It is not an SPD training, and the City's designee will not be speaking to the content or the Involved Officer's compliance with any CJTC training.
C. Use of Force Trainings				
	Training	Include	Exclude	Explanation
1.	2016 Post BLEA Use of Force Decision Making – Scenarios (Hay)		X	The 2016 Post BLEA Use of Force Decision Making Scenarios training materials are the same materials as 2015 Post

1				BLEA Use of Force Decision Making Scenarios	
2	2.	2016 Officer Sustainment Use of Force (Hay)		X	The 2016 Officer Sustainment Use of Force training materials are the same materials as 2015 Officer Sustainment Use of Force
3	3.	2016 Post BLEA Core Principles (Hay)	X –		It is the City’s position that the 2016 Post BLEA Core Principles contains portions of relevant material. However, training on the topics related but not limited to Deadly Force, Type II Force, and Type III Force are not relevant and should be excluded.
4		CITY_Fredericks_A-00000960-1046			
5	4.	2016 Post BLEA Use of Force Decision Making (Hay)		X	The 2016 Post BLEA Use of Force Decision Making training materials are the same materials as 2015 Post BLEA Use of Force Decision making.
6	5.	2016 Post BLEA Defensive Tactics #1 Control and Cuffing (Hay)		X	The 2016 Post BLEA Defensive Tactics # 1 Control and Cuffing training materials are the same materials as 2015 Post BLEA Defensive Tactics #1 Control and Cuffing.
7	6.	2015 Post BLEA Defensive Tactics #1 Control and Cuffing (Rogers)	X-		It is the City’s position that the 2015 Post BLEA Defensive Tactics #1 Control and Cuffing training module contains portions of relevant material. However, training materials related to force not involved in the Fredericks Inquest , including but not limited to, Clinch & Pummeling, Counter Grappling-Self Defense at Close Range, 50/50 Position, Bicep Control, Wrist Control, Weapon Retention, and Counter-Grappling Self-Defense at Medium Range are not relevant and should be excluded.-
8		CITY_Fredericks_A-00001065-1350			

1	7.	2015 Integrated Use of Force and Tactics (Rogers, Jerome, Oliverson)	X-Portions		It is the City's position that the 2015 Integrated Use of Force and Tactics training contains portions of relevant material. However, training materials related to scenarios or force not involved in the Fredericks Inquest, including but not limited to, Multiple Office Building Searches, Less Lethal Team Tactics, Drag & Carries, Combat Application of Tourniquets, Counterstriking, and Turtled Suspects are not relevant and should be excluded.
2		CITY_Fredericks_A_00001857-1959			
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9	8.	2015 Post BLEA Use of Force Decision Making (Swartz, Rogers)	X-Portions		It is the City's position that the 2015 Post BLEA Use of Force Decision Making training contains portions of relevant material. However portions of the training materials related but not limited to deadly force, less lethal force and tools, use of force reporting and investigation, and reviewing use of force are not relevant and should be excluded.
10		CITY_Fredericks_A_00000735-789			
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15	9.	2015 Officer Sustainment Use of Force (Swartz, Rogers, Jerome, Oliverson)	X-Portions		It is the City's position that the 2015 Officer Sustainment Use of Force training module contains portions of relevant material. However, portions of the training materials related but not limited to Type II force, Type III force, deadly force, use of force reporting and investigation, and reviewing use of force are not relevant and should be excluded.
16		CITY_Fredericks_A_00001351-1648			
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20	10.	2015 Post BLEA Core Principles (Swartz, Rogers, Jerome)	X-Portions		It is the City's position that the 2015 Post BLEA Core Principles training contains portions of relevant material. This training module is very similar to the Core Principles included in the 2016 Post BLEA
21		CITY_Fredericks_A_0000790-860.			
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1				Core Principles at, CITY_Fredericks_A 00001001-1042, and therefore the Inquest Program should consider eliminating training modules that are incredibly similar from year to year.	
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5	11.	2015 Post BLEA Core Principles (Oliverson) CITY_Fredericks_A_00000790-860.		X	Duplicative. Please see the City's response to no. 10 above.
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8	12.	2015 Post BLEA Use of Force Decision Making (Swartz, Rogers) CITY_Fredericks_A_00000735-789		X	Duplicative. Please see the City's response to, no. 8, above.
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11	13.	2014 Use of Force Core Principles (Jerome, Oliverson) CITY_Fredericks_A_00000861-959	X-Portions		It is the City's position that the 2014 Use of Force Core Principles training contains portions of relevant material. However portions of the training related but not limited to deadly force less lethal force and tools, use of force reporting and investigation, and reviewing use of force are not relevant and should be excluded.
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16	14.	2014 ICC 1 – Control and Cuffing (Jerome) CITY_Fredericks_A_00001065-1350.		X	Duplicative. Please see entry nos. 5-6 above.
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D. Miscellaneous Trainings					
19		Training	Include	Exclude	Explanation
20	1.	2016 CPR/AED per ASHI Standards (Swartz, Hay, Rogers, Jerome, Oliverson) CITY_Fredericks_A_00001649-1841		X	This training module involves conducting CPR and using AED. Mr. Fredericks' heart stopped beating while he was in the custody of the AMR EMTs. The evidence is undisputed that EMTs found a "thready pulse" of approximately 40 beats per
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1				minute when Mr. Fredericks was in the back of the ambulance, thought it was “purposeful,” and declined Officer Oliverson’s offer to call Fire. The AMR EMTs, and not SPD, were responsible for administering CPR and AED, if appropriate, once they were on scene and/or once Mr. Fredericks’ heart stopped. There is no reliable, non-speculative evidence that Mr. Fredericks’ heart stopped at any earlier point, let alone that officers were or should have been aware of that fact. SPD’s trainings on CPR and AED are not relevant and should be excluded.	
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11	1.	2014 First Aid (Jerome, Oliverson)		X	Mr. Fredericks’ heart stopped beating while in the custody of the AMR EMTs. This training module covers AED, CPR, bandaging with Oleas 4” field dressing, and combat application tourniquets. None of these techniques or skills are relevant to this Inquest.
12		CITY_Fredericks_A_00001842-1856			
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16	2.	Training Regarding Approach/Contact (as referenced in FIT report at Fredericks_A 0791) (Oliverson and Rogers)		X	No responsive training materials were located
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18	3.	Training Regarding use of specific terms and phrases that are (1) commonly used (2) clearly defined and (3) usage understood by all officers. (As referenced in FIT report at Fredericks_A 0791) (Oliverson and Rogers)		X	The City objected to the production of these trainings on the grounds they were prospective in nature and not reflective of the training existing at the time of the incident. Therefore, they do not relate to the manner in which Mr. Fredericks died, and instead, deal with officer safety and internal communicate issues.
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				Subject to the objections, the City did not locate any responsive training modules specifically on the topic of the term "Under Control."
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In conclusion, it is the City’s position that the training scope should be limited to the actual training materials that are relevant to the facts and circumstances surrounding Mr. Fredericks’ death. The training scope should be narrowly tailored to only include training that applied in the incident and not be so broad to include training that has no bearing on the circumstances surrounding his death.

DATED this 19th day of October, 2022.

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CERTIFICATE OF SERVICE

I certify that on the 19th day of October, 2022, I caused a true and correct copy of this document to be served on the following in the manner indicated below:

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