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KING COUNTY DEPARTMENT OF EXECUTIVE SERVICES
INQUEST PROGRAM

INQUEST INTO THE DEATH OF:

ALBERT WAYNE FREDERICKS, JR.,

Deceased.

Inquest No.: 17IQ427069

**INVOLVED OFFICERS’
PROPOSED NARROWED LIST
OF SEATTLE POLICE
DEPARTMENT TRAINING
MATERIALS**

Per the Inquest Administrator’s October 12, 2022 order, the involved officers (“IOs”) hereby identify their proposed list of narrowed trainings. This list is based on the Administrator’s previous orders regarding the scope of this inquest dated 8/8/22 (training scope) and 9/8/22 (policy scope). The IOs join the City’s ongoing objections to the policy and training scope; the IOs note that by submitting this list, the IOs are not waiving their right to further object to the trainings should additional information come to light re admissibility or relevance. The IOs also note that the training materials that fall under the “include” column definitely contain portions that are irrelevant and will not be helpful to the jury; all trainings that fall in that column are

1 specifically marked as “X – portions” to clarify that point and because there is not a single
 2 produced file that is completely relevant.

3 The IOs object to the sheer volume of training documents that they presume the family
 4 wants to use during testimony and/or admit into evidence. The trainings should be dramatically
 5 narrowed as the training designee’s testimony will be most helpful to the jury because these
 6 trainings without context are confusing and invite speculation; while officers do go through these
 7 trainings, their overall training is ongoing, cumulative and concept based, not specific to any one
 8 training module.

Start Bates No.	End Bates No.	Original File Name	Include	Exclude	Explanation
CITY_Fredericks_A_00000001	CITY_Fredericks_A_00000083	2014 Bias-free Policing PowerPoint.pdf [83 pages]	X -portions		IOs agree with City’s position. As an example, the following should be included if bias free policing training materials are considered not relevant over the IOs and City’s objections. CITY_Fredericks_A_00000054-67.
CITY_Fredericks_A_00000084	CITY_Fredericks_A_00000493	2014 Complete Terry Bias ISDM submitted 9-2 mod 10-29 cleaned copy 8-5-2015 .pdf [410 pages]		X	IOs agree with City’s position.
CITY_Fredericks_A_00000494	CITY_Fredericks_A_00000494	Up in the Air (2009) racist _stereotype scene (mirrored horizontally).mp4		X	IOs agree with City’s position.
CITY_Fredericks_A_00000495	CITY_Fredericks_A_00000495	POLICE OFFICER GOES BALISTIC WHEN CONFRONTING CITIZEN WHO KNOWS THE LAW.mp4		X – not helpful to jury .mp4 video clip	
CITY_Fredericks_A_00000496	CITY_Fredericks_A_00000496	Crash (1_9) Movie CLIP - Car Jacking		X – not helpful to	

1			(2004) HD.mp4		jury .mp4 video clip	
2	CITY_Fredericks A_00000497	CITY_Fredericks s_A_00000497	Ronald Weekley.mov	X-portions		IOs agree with City's position.
3	CITY_Fredericks _A_00000498	CITY_Fredericks s_A_00000498	Clayton Powell.mov		X – not helpful to jury .mp4 video clip	IOs agree with City's position.
4	CITY_Fredericks _A_00000499	CITY_Fredericks s_A_00000499	bird falling full movie.wmv		X – not helpful to jury .mp4 video clip	
5	CITY_Fredericks _A_00000500	CITY_Fredericks s_A_00000500	Police Officer Explodes.mov		X – not helpful to jury .mp4 video clip	
6	CITY_Fredericks _A_00000501	CITY_Fredericks s_A_00000501	Bird nest movie.wmv		X – not helpful to jury .mp4 video clip	Duplicate of CITY_Fredericks_A_00 000499
7	CITY_Fredericks _A_00000502	CITY_Fredericks s_A_00000502	2 am Car Crash.mov		X – not helpful to jury .mp4 video clip	
8	CITY_Fredericks _A_00000503	CITY_Fredericks s_A_00000503	UNT Officers on Fry Street circumnavigate the 4th amendment via terry stop (1).mp4		X – not helpful to jury .mp4 video clip	
9	CITY_Fredericks _A_00000504	CITY_Fredericks s_A_00000504	Seattle Police Officer Punches Girl In The Face.mp4		X – not helpful to jury .mp4 video clip	
10	CITY_Fredericks _A_00000505	CITY_Fredericks s_A_00000505	ABC's What Would You Do (Bike Thief).mp4		X – not helpful to jury .mp4 video clip	
11	CITY_Fredericks A_00000506	CITY_Fredericks s_A_00000506	6336@2014062214 2147.MPG		X	
12	CITY_Fredericks A_00000507	CITY_Fredericks s_A_00000507	ICV traffic stop .mpg		X	
13	CITY_Fredericks A_00000508	CITY_Fredericks s_A_00000508	ICV Traffic - Bias Free Policing.mpg		X	
14	CITY_Fredericks _A_00000509	CITY_Fredericks s_A_00000509	ICV Traffic 0150- Bias Free Policing.mov		X	
15	CITY_Fredericks _A_00000510	CITY_Fredericks s_A_00000510	ICV Traffic 920- Bias Free Policing.mov		X	
16	CITY_Fredericks _A_00000511	CITY_Fredericks s_A_00000631	2016 Crisis Intervention Training.pdf [121 pages]	X-portions		IOs agree with City's position.
17			2015 Adv. CIT (Rogers, Jerome)			In general, the IOs agree with the City's

1			CITY_Fredericks_A_00000632-734			position on 0000632-000734 and any differences/additions are noted below.
2						
3						“It is the City’s position that the 2015 Adv. CIT training contains portions of relevant material.”
4						
5	CITY_Fredericks_A_00000632	CITY_Fredericks_A_00000633	intcit1221.pptx [Tactical De-Escalation of Persons in Crisis]	X-portions		IOs agree with City’s position. “It is the City’s position that the 2015 Adv. CIT training contains portions of relevant material.”
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7						
8	CITY_Fredericks_A_00000634	CITY_Fredericks_A_00000660	CIT Advanced Lesson Plan (10-1).pdf [27 pages]	X-portions		IOs agree with City’s position.
9						
10	CITY_Fredericks_A_00000661	CITY_Fredericks_A_00000734	Advanced CIT Powerpoint (2015).pdf [74 pages]	X-portions		IOs agree with City’s position. E.g., CITY_Fredericks_A_00000675-78 and 000679-702, 000703-13.
11						
12						
13	CITY_Fredericks_A_00000735	CITY_Fredericks_A_00000787	2 - PBLEA UOF #1 9-24-15 .pdf	X-portions		IOs agree with City’s position.
14	CITY_Fredericks_A_00000788	CITY_Fredericks_A_00000789	TCM-UOF DD Color Handout.pdf	X-portions		IOs agree with City’s position.
15	CITY_Fredericks_A_00000790	CITY_Fredericks_A_00000832	updated UOF Core Principles 9-23-2015 .pdf [43 pages]	X-portions		IOs agree with City’s position.
16						
17	CITY_Fredericks_A_00000833	CITY_Fredericks_A_00000833	Core Video #5.avi	X-portions		IOs agree with City’s position.
18	CITY_Fredericks_A_00000834	CITY_Fredericks_A_00000834	Core Video #4.avi	X-portions		IOs agree with City’s position.
19	CITY_Fredericks_A_00000835	CITY_Fredericks_A_00000835	Core Video #1.avi	X-portions		IOs agree with City’s position.
20	CITY_Fredericks_A_00000836	CITY_Fredericks_A_00000836	6880@2013061002 3135.mpg	X-portions		IOs agree with City’s position.
21	CITY_Fredericks_A_00000837	CITY_Fredericks_A_00000837	Baltimore.mov	X-portions		IOs agree with City’s position.
22	CITY_Fredericks_A_00000838	CITY_Fredericks_A_00000838	Core Bonus Video full length .avi	X-portions		IOs agree with City’s position.
23	CITY_Fredericks_A_00000839	CITY_Fredericks_A_00000839	7543@2013080302 1136.mpg	X-portions		IOs agree with City’s position.
	CITY_Fredericks_A_00000840	CITY_Fredericks_A_00000840	2013-426223.mp4	X-portions		IOs agree with City’s position.
	CITY_Fredericks_A_00000841	CITY_Fredericks_A_00000841	7427@2013121720 3333.mpg	X-portions		IOs agree with City’s position.
	CITY_Fredericks	CITY_Fredericks	Core Video #1.avi	X-portions		IOs agree with City’s position.

1	A 0000842	s A 0000842				position.
2	CITY_Fredericks A 0000843	CITY_Frederick s A 0000843	Core Video 2.mov	X-portions		IOs agree with City's position.
3	CITY_Fredericks A 0000844	CITY_Frederick s A 0000844	Core Video 1.mov	X-portions		IOs agree with City's position.
4	CITY_Fredericks A 0000845	CITY_Frederick s A 0000845	7600@2013092716 5140.mpg	X-portions		IOs agree with City's position.
5	CITY_Fredericks A 0000846	CITY_Frederick s A 0000846	5781@2013092716 5426.mpg	X-portions		IOs agree with City's position.
6	CITY_Fredericks A 0000847	CITY_Frederick s A 0000848	5--Core Exercise #5 12-31-2015 .pdf	X-portions		IOs agree with City's position.
7	CITY_Fredericks A 0000849	CITY_Frederick s A 0000849	1--Core Exercise #1 12-31-15 .pdf	X-portions		IOs agree with City's position.
8	CITY_Fredericks A 0000850	CITY_Frederick s A 0000851	Core Exercise #2 12-31-2015 .docx	X-portions		IOs agree with City's position.
9	CITY_Fredericks A 0000852	CITY_Frederick s A 0000852	Core Exercise #1 12-31-15 .docx		X	IOs agree with City's position.
10	CITY_Fredericks A 0000853	CITY_Frederick s_A_0000854	Core Bonus Exercise 12-31- 2015.docx		X	IOs agree with City's position.
11	CITY_Fredericks A 0000855	CITY_Frederick s A 0000855	Core Principles Cover Page .docx	X-portions		IOs agree with City's position.
12	CITY_Fredericks A 0000856	CITY_Frederick s A 0000856	Core Exercise #4 12-31-2015 .docx	X-portions		IOs agree with City's position.
13	CITY_Fredericks A 0000857	CITY_Frederick s A 0000858	Core Exercise #3 12-31-2015 .docx	X-portions		IOs agree with City's position.
14	CITY_Fredericks A 0000859	CITY_Frederick s_A_0000860	Core Exercise #5 12-31-2015 .docx	X-portions		IOs agree with City's position.
15	CITY_Fredericks A_0000861	CITY_Frederick s_A_0000901	UOF Core Principles Lesson Plan .pdf	X-portions		IOs agree with City's position.
16	CITY_Fredericks A 0000902	CITY_Frederick s A 0000943	UOF Core Principles PP .pdf	X-portions		IOs agree with City's position.
17	CITY_Fredericks A 0000944	CITY_Frederick s A 0000944	#6 Bonus--Heller traffic stop edit.mp4		X	IOs agree with City's position.
18	CITY_Fredericks A 0000945	CITY_Frederick s A 0000945	Core Video #1-- Edit.mp4		X	IOs agree with City's position.
19	CITY_Fredericks A 0000946	CITY_Frederick s A 0000946	Core Video #5.avi	X-portions		IOs agree with City's position.
20	CITY_Fredericks A 0000947	CITY_Frederick s A 0000947	Core Video #4.avi		N	IOs agree with City's position.
21	CITY_Fredericks A 0000948	CITY_Frederick s A 0000948	Core Principles Cover .pdf	X-portions		IOs agree with City's position.
22	CITY_Fredericks A_0000949	CITY_Frederick s_A_0000950	Core Exercise #5 .pdf		X- Duplicate	IOs agree with City's position. Duplicate of 000859.
23	CITY_Fredericks A 0000951	CITY_Frederick s A 0000952	Core Bonus Exercise .pdf		X	IOs agree with City's position.
24	CITY_Fredericks A 0000953	CITY_Frederick s A 0000954	Core Exercise #3 .pdf	X-portions		IOs agree with City's position.
25	CITY_Fredericks A 0000955	CITY_Frederick s A 0000956	Core Exercise #1 .pdf		X	IOs agree with City's position.
26	CITY_Fredericks A 0000957	CITY_Frederick s A 0000958	Core Exercise #2 .pdf	X-portions		IOs agree with City's position.

INVOLVED OFFICERS' PROPOSED
NARROWED LIST OF SEATTLE POLICE
DEPARTMENT TRAINING MATERIALS – 1

FREY BUCK P.S.
1200 FIFTH AVENUE, SUITE 1900
SEATTLE, WA 98101
T: (206) 486-8000 F: (206) 902-9660

1	CITY_Fredericks A 00000959	CITY_Fredericks A 00000959	Core Exercise #4 .pdf	X-portions		IOs agree with City's position.
2	CITY_Fredericks _A_00000960	CITY_Fredericks _A_00001000	UOF Core Principles Lesson Plan 5-9 .pdf		X - Duplicate	IOs agree with City's position.
3	CITY_Fredericks A 00001001	CITY_Fredericks A 00001042	UOF Core Principles 5-14 .pdf	X-portions		IOs agree with City's position.
4	CITY_Fredericks A 00001043	CITY_Fredericks A 00001043	Core Video #4.avi	X-portions		IOs agree with City's position.
5	CITY_Fredericks A 00001044	CITY_Fredericks A 00001044	Core Video #5.avi	X-portions		IOs agree with City's position.
6	CITY_Fredericks A 00001045	CITY_Fredericks A 00001045	Holding Cell kicking door.avi		X	
7	CITY_Fredericks A 00001046	CITY_Fredericks A 00001046	6880@2013061002 3135.mpg	X-portions		IOs agree with City's position.
8	CITY_Fredericks A 00001047	CITY_Fredericks A 00001047	7543@2013080302 1136.mpg	X-portions		IOs agree with City's position.
9	CITY_Fredericks A 00001048	CITY_Fredericks A 00001048	2013-426223.mp4	X-portions		IOs agree with City's position.
10	CITY_Fredericks A 00001049	CITY_Fredericks A 00001049	7427@2013121720 3333.mpg	X-portions		IOs agree with City's position.
11	CITY_Fredericks A 00001050	CITY_Fredericks A 00001050	Core Video #1.avi	X-portions		IOs agree with City's position.
12	CITY_Fredericks A 00001051	CITY_Fredericks A 00001051	Core Bonus Video full length .avi	X-portions		IOs agree with City's position.
13	CITY_Fredericks A 00001052	CITY_Fredericks A 00001052	Core Video #1.avi		X	IOs agree with City's position.
14	CITY_Fredericks A 00001053	CITY_Fredericks A 00001053	Core Video 2.mov		X	IOs agree with City's position.
15	CITY_Fredericks A 00001054	CITY_Fredericks A 00001054	Core Video 1.mov		X - Duplicate	IOs agree with City's position.
16	CITY_Fredericks A 00001055	CITY_Fredericks A 00001055	7600@2013092716 5140.mpg		X	IOs agree with City's position.
17	CITY_Fredericks A 00001056	CITY_Fredericks A 00001056	5781@2013092716 5426.mpg		X - Duplicate	IOs agree with City's position.
18	CITY_Fredericks A 00001057	CITY_Fredericks A 00001057	0--Core Principles Cover Page .pdf	X-portions		IOs agree with City's position.
19	CITY_Fredericks A 00001058	CITY_Fredericks A 00001058	4--Core Exercise #4 12-31-2015 .pdf		X - Duplicate	IOs agree with City's position.
20	CITY_Fredericks A 00001059	CITY_Fredericks A 00001060	3--Core Exercise #3 12-31-2015 .pdf	X-portions		IOs agree with City's position.
21	CITY_Fredericks _A_00001061	CITY_Fredericks _A_00001062	6--Core Bonus Exercise 12-31- 2015.pdf		X	IOs agree with City's position.
22	CITY_Fredericks A 00001063	CITY_Fredericks A 00001064	2--Core Exercise #2 12-31-2015 .pdf	X-portions		IOs agree with City's position.
23	CITY_Fredericks A 00001065	CITY_Fredericks A 00001096	2015 DT ISDM Clinch.docx	X-portions		IOs agree with City's position.
	CITY_Fredericks A 00001097	CITY_Fredericks A 00001163	2015 DT Skills One.docx	X-portions		IOs agree with City's position.
	CITY_Fredericks A 00001164	CITY_Fredericks A 00001230	2015 DT Skills One.pdf	X-portions		IOs agree with City's position.
	CITY_Fredericks A 00001231	CITY_Fredericks A 00001290	2015 DT Skills One- -FINAL.docx	X-portions		IOs agree with City's position.
	CITY_Fredericks	CITY_Fredericks	2015 DT Skills One-	X-portions		IOs agree with City's

1	A_00001291	s_A_00001350	-FINAL.pdf			position.
2	CITY_Fredericks_A_00001351	CITY_Fredericks_A_00001456	2015 Officer Sustainment UOF - final ISDM .pdf	X-portions		IOs agree with City's position.
3	CITY_Fredericks_A_00001457	CITY_Fredericks_A_00001545	CLASSROOM POWER POINT 2015 Officer Sustainment UOF updated 8-19 CLASSROOM .pptx	X-portions		IOs agree with City's position.
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6	CITY_Fredericks_A_00001546	CITY_Fredericks_A_00001631	CLASSROOM POWER POINT 2015 Officer Sustainment UOF updated 8-19 CLASSROOM .pdf	X-portions		IOs agree with City's position.
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8	CITY_Fredericks_A_00001632	CITY_Fredericks_A_00001632	Protester Arrest.mov		X	
9	CITY_Fredericks_A_00001633	CITY_Fredericks_A_00001633	Ground fight .mov		X	
10	CITY_Fredericks_A_00001634	CITY_Fredericks_A_00001634	Armed carjackers.mov	X-portions		IOs agree with City's position.
11	CITY_Fredericks_A_00001635	CITY_Fredericks_A_00001635	Takedown .mov		X	
12	CITY_Fredericks_A_00001636	CITY_Fredericks_A_00001636	Dancing at the Jefferson Memorial.mov		X	
13	CITY_Fredericks_A_00001637	CITY_Fredericks_A_00001637	Takedown 2.mov		X - Duplicate	
14	CITY_Fredericks_A_00001638	CITY_Fredericks_A_00001638	Running Man in Traffic.mov	X-portions		IOs agree with City's position.
15	CITY_Fredericks_A_00001639	CITY_Fredericks_A_00001639	Body Cam Shooting.mov		X	
16	CITY_Fredericks_A_00001640	CITY_Fredericks_A_00001640	Obstructing Arrest, multiple suspects .mp4		X	
17	CITY_Fredericks_A_00001641	CITY_Fredericks_A_00001641	Gun Takeaway.mov	X-portions		IOs agree with City's position.
18	CITY_Fredericks_A_00001642	CITY_Fredericks_A_00001642	Resisting Arrest Getting in Back Seat .mov		X	
19	CITY_Fredericks_A_00001643	CITY_Fredericks_A_00001643	Florida Deputies.mov		X	
20	CITY_Fredericks_A_00001644	CITY_Fredericks_A_00001644	Woman refuses to get off Subway.mov	X-portions		IOs agree with City's position.
21	CITY_Fredericks_A_00001645	CITY_Fredericks_A_00001645	Suspect takes TASER .mp4		X	
22	CITY_Fredericks_A_00001646	CITY_Fredericks_A_00001646	Photographing Police Facility.mov		X	
23	CITY_Fredericks_A_00001647	CITY_Fredericks_A_00001647	Subway Platform Fight.mov		X	
	CITY_Fredericks_A_00001648	CITY_Fredericks_A_00001648	AK Trooper Combo.mov	X-portions		IOs agree with City's position.
			2016 CPR/AED per		X	IOs agree with City's

INVOLVED OFFICERS' PROPOSED
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T: (206) 486-8000 F: (206) 902-9660

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		ASHI Standards (Swartz, Hay, Rogers, Jerome, Oliverson) CITY_Fredericks_A_00001649-1841			position on 0001649-1841.
CITY_Fredericks_A_00001649	CITY_Fredericks_A_00001652	16_130_Sick and Injured Persons_AED Standing Orders.pdf		X	
CITY_Fredericks_A_00001653	CITY_Fredericks_A_00001838	SPD 2016 CPR AED ISDM.pdf		X	
CITY_Fredericks_A_00001839	CITY_Fredericks_A_00001839	AED_Final.mp4		X - Tech difficulty	
CITY_Fredericks_A_00001840	CITY_Fredericks_A_00001841	CPR AED Course Outline.docx		X	
CITY_Fredericks_A_00001842	CITY_Fredericks_A_00001856	2014 First aid FINAL revised 05-08.doc		X	
CITY_Fredericks_A_00001857	CITY_Fredericks_A_00001959	2015 Integrated Tactics ISDM-Final.pdf 2015 Integrated Use of Force and Tactics (Rogers, Jerome, Oliverson) CITY_Fredericks_A_00001857-1959	X-portions		IOs agree with City's position. "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."
Fredericks_A_002412	Fredericks_A_002522	2412-2522 2015 CIT King County 40 hour 2412-2522.pdf		X	IOs agree with City's position. There are no responsive materials to this request, because the training was put on by CJTC. It is the IOs' position that

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					<p>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.</p> <p>If the IA does include these CIT trainings, only portions of Fredericks_A 002465-67 should be included.</p>
Fredericks_A002 523	Fredericks_A002 781	2523-2781 2016 CIT King County 40 hour 2523-2781.pdf		X	<p>IOs agree with City's position.</p> <p>There are no responsive materials to this request, because the training was put on by CJTC. It is the IOs' 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.</p> <p>If the IA does include these CIT trainings, only specific sections of Fredericks_A 002583-2713 should be included.</p>
Fredericks_A002 782	Fredericks_A003 829	2523-2781 2017 CIT King County 40 hour		X	<p>IOs agree with City's position.</p> <p>If the IA does include these CIT trainings, only <i>specific</i> sections of the list below may be relevant.</p> <ul style="list-style-type: none"> a. 3830 Critical Analysis of Force.pptx [46 pages] b. 2782-3829 2017 CIT King County 40 hour.pdf [1048 pages]

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					(Fredericks_A 002782-3829) c. 3834 Critical Analysis of Force.pptx [46 pg pptx] [duplicate of Fredericks_A00383 0] d. 3842 - 2017 CJTC Excited Delirium and Police In- Custody Deaths.pptx [46 pages] e. 3843 - CJTC Excited Delirium and Police In- Custody Deaths.pptx [46 pages - 2018] There are no responsive materials to this request, because the training was put on by CJTC. It is the IOs' 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.
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DATED this 20th day of October, 2022, at Seattle, Washington.

FREY BUCK, P.S.

By: /s/ Delaney DiGiovanni
Ted Buck, WSBA #22029
Karen L. Cobb, WSBA #34958
Delaney DiGiovanni, WSBA
Attorneys for Seattle Police Department
Involved Officers