

JUROR QUESTION FORM

QUESTION FOR WITNESS: D. Simmons
(print witness name)

① What indicated that AMR EMTs had taken vitals (pulse) when first placed in ambulance?
From ~~body~~ I couldn't tell. It seemed like there was some time when Albert was nonresponsive before 11:38:45 or 50 when EMTs determined that there was no pulse.)

② Maybe this would be better saved for testimony of witnesses Ota or Hayer

[Inquest Office Use Only – please do not write below this line]

	Objection	No Objection	Question Asked?
Counsel for SPD:	Outside scope; ① Other witnesses ② yes	_____	Yes ___ No <input checked="" type="checkbox"/> M Anders 3/30/2023
Counsel for Officers:	other witnesses agree	_____	
Inquest Program Atty:	① they will hear testimony about this from other Ws ② agreed!	_____	

JUROR QUESTION FORM

Det. David Simmons

QUESTION FOR WITNESS: ~~David Simmons~~
(print witness name)

① How is it decided whether or not ALS/Fire Dept is needed for a person in distress? (Protocol)

② How long after the EMT initially refused calling for ALS/Fire Dept did they eventually call?

[Inquest Office Use Only – please do not write below this line]

Objection

No Objection

Question Asked?

Counsel for SPD:

① Outside scope
② No objection

Yes No

#2
MA
3/30/2023

Counsel for Officers:

1 other witness
2

DC
✓

Inquest Program Atty:

①
②

✓
✓

JUROR NO. 1

Date: 3/30/2023

JUROR QUESTION FORM

QUESTION FOR WITNESS: Zoe
(print witness name)

You heard Mr. Fredricks yelling shouting.
How long was it you can't hear him any more
before the ~~EM~~ ambulance come?

[Inquest Office Use Only – please do not write below this line]

	<i>Objection</i>	<i>No Objection</i>	<i>Question Asked?</i>
Counsel for SPD:	<u>Confusing as asked – should be rephrased</u>	<input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <u>M Anderson</u> <u>3/30/2023</u>
Counsel for Officers:			
Inquest Program Atty:		<input checked="" type="checkbox"/>	

JUROR NO. 3

Date: 3/30/2023

JUROR QUESTION FORM

QUESTION FOR WITNESS: Zecy Lewandowski
(print witness name)

① Did you see what the officers were doing when the man was on the ground?

② Did you notice how long he was on the ground?

[Inquest Office Use Only – please do not write below this line]

	Objection	No Objection	Question Asked?
Counsel for SPD:	_____	① ✓	Yes ✓ No _____
	_____	② ✓	Yes ✓
Counsel for Officers:	_____	① ✓	M Anderson
	_____	② ✓	3/30/2023
Inquest Program Atty:	_____	① ✓	
	_____	② ✓	

JUROR QUESTION FORM

QUESTION FOR WITNESS: Nick Fradkin
(print witness name)

~~Did you see how the police took the man to the ground?~~

Did you see what the police were doing to keep the man on the ground?

[Inquest Office Use Only – please do not write below this line]

Objection Foundation.

No Objection

Question Asked?

Counsel for SPD:

~~obj~~ The witness did not necessarily remember the position of Mr. Fredericks

Yes No

~~No objection~~
Marene Anderson

Counsel for Officers:

✓

Inquest Program Atty:

✓

JUROR QUESTION FORM

+ yellow highlight
text asked on
3/31/2023

QUESTION FOR WITNESS: attorney
(print witness name)

Beard 3/31/23
question #1 only

re: officer
Beard's
testimony

Exhi 4C 1. Which officer said "Get hi'm on stomach"? Why is that needed? In what situation is that needed? ✓

2. Was handcuff put on his hands or feet? (Mr. Fredrick's) Why is that needed?

3. What is the impact to a human when ^{a person} he is put on stomach according to the medical research?

4. Why ~~does~~ is Mr. Fredrick's family attorney not ^{presenting in this hearing?} presenting in this hearing?
[Inquest Office Use Only - please do not write below this line]

Objection: 1 OK with part 1, object to other 2 parts as outside the scope of this witness' testimony. No Objection: _____ Question Asked? Yes ___ No ✓

Counsel for Officers: 2 OK with part 1, object to second part for same reasons. 1 ~~both~~ agree w/ city. 2 OK. 3 other witnesses. other witnesses will testify on this.

Inquest Program Atty: 1 OK to ask. 2 " " ". 3 if he knows.

Beard: 1 No objection. 1 OK - may be better for officers.

3 outside scope, calls for speculation, calls for expert testimony.

SPD 1 First part OK, next 2 parts are outside scope + will be other witness.

JUROR QUESTION FORM

QUESTION FOR WITNESS: Beund
(print witness name)

If you know,

① ^{was en route} When ambulance ~~arrived~~, who said "Still breathing?"

② What, if anything, do you recall officers doing to determine if ~~still breathing~~? Fredericks was "still breathing"? [Before AMR arrived.]

③ Where in body cam footage did you see Fredericks breathing after he had been controlled, (before AMR arrived)?

[Inquest Office Use Only - please do not write below this line]

	Objection	No Objection
Counsel for SPD:	① NO	① X
	②	② X
	③ Foundation; no body worn shown to him that depicted breathing	
Counsel for Officers:	①	X
	②	X
	③ Same as SPD	
Inquest Program Atty:	①	✓
	②	✓
	③	✓

Question Asked?

Yes	No
#1 ✓	#3
#2 ✓	

M. Anderson

JUROR QUESTION FORM

QUESTION FOR WITNESS: Officer Beard
(print witness name)

~~1. what was Mr. Fredrick's condition after he was put on his stomach? I can't hear him talking from the video anymore.~~
any more

From Officer Beard's body worn camera, I noticed there were TEN officers in the scene and around SIX control Mr. Fredricks. Why six officers are needed to control an unarmed man? What's the protocol?

[Inquest Office Use Only - please do not write below this line]

	Objection	No Objection	Question Asked?
Counsel for SPD:	<u>outside scope</u> <u>Speculation; other</u> <u>witness will testify on this</u>		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <u>M Anderson</u>
Counsel for Officers:	<u>No obj but better</u> <u>for others officer</u>	<input checked="" type="checkbox"/>	
Inquest Program Atty:		<input checked="" type="checkbox"/>	

JUROR QUESTION FORM

QUESTION FOR WITNESS: Inquest Administrator . SPD
(print witness name)

Exhibit 4C is the video from one of the officer's body worn camera. From the video, there were about 8 or 10 officers. Are the ~~the~~ body worn camera videos from other officers' available for view? as that scene is the key scene.

I would request additional or all full ^(Mr. Hay's body worn video in particular) videos for that scene so that I can see what officers did to Mr. Fredricks.

[Inquest Office Use Only - please do not write below this line]

Objection

No Objection

Question Asked?

Counsel for SPD:

Yes, other BWV's will be shown with other witnesses

Yes ___ No
M Anderson

Counsel for Officers:

agree

Inquest Program Atty:

~~will~~
Other BWV's will be shown

JUROR QUESTION FORM

QUESTION FOR WITNESS: SPD
(print witness name)

which officer called the ambulance of the call
when and what's the timestamp from
the AMR record / fire dept record ?

what's the timestamp when Mr. Fredricks was
shouting " call ambulance !"

I'd like to know the time lapse.

[Inquest Office Use Only - please do not write below this line]

	Objection	No Objection	Question Asked?
Counsel for SPD:	<u>Same objection</u>		Yes ___ No <input checked="" type="checkbox"/> M Anderson
Counsel for Officers:	<u>other officers</u> <u>will answer</u>		
Inquest Program Atty:	<u>this officer will not</u> <u>know this. Attys</u> <u>will work to present</u> <u>timeline, if approp.</u>		

JUROR QUESTION FORM

QUESTION FOR WITNESS: Patrick Hayes
(print witness name)

Is there anything you can tell from
or can assure you that Mr. Fredricks
was ~~still~~ ^{alive when} ~~after~~ you first saw ~~him~~?
~~Mr. Fredrick~~?

[Inquest Office Use Only – please do not write below this line]

Objection	No Objection	Question Asked?
<u>Ambiguous, vague,</u> <u>confusing</u>	_____	Yes <input checked="" type="checkbox"/> No _____ <u>as amended</u> <u>M. Anderson</u> <u>4/3/2023</u>
_____	_____	

Counsel for SPD:

Counsel for Officers:

agree w/obj

Inquest Program Atty:

✓

JUROR QUESTION FORM

QUESTION FOR WITNESS: Patricia Hayer
(print witness name)

① Do you feel that SPD did not properly explain ^{what became} the severity of Mr. Friedrich's condition?
(For example screaming for medical help, then going silent and limp / a severe change in behavior)

② If ~~he~~ ^{Mr. Friedrichs} was pale, unresponsive to painful stimuli and had a thready pulse why did you not call the fire department ~~at that time?~~ (when SPD asked if ~~fire~~ ^{fire} was needed)

[Inquest Office Use Only - please do not write below this line]

Counsel for SPD: ① Agree with Inquest Program Attorney ② No

Counsel for Officers: ① agree w/ obj. ② ✓

Inquest Program Atty: ① facts this witness does not know - "severity of condition"; also outside his expertise ② no objections

Question Asked?
Yes No
as amended in red ink.
M. Anderson
4/3/2023

JUROR QUESTION FORM

QUESTION FOR WITNESS: Patrick Hayes
(print witness name)

- 1 where ~~when~~ did you first take vital signs? on the ground? on the gurney?
~~I have checked him again in the ambulance~~
- 3 If he was non-responsive and his pulse was ~~sketchy~~ "thready" why did you say his lack of response was purposeful?
- 2 If you did not check pulse/breathing on the ground, why not?

[Inquest Office Use Only - please do not write below this line]

	Objection	No Objection	Question Asked? Yes ___ No ___
Counsel for SPD:	_____	① ✓	① ✓
	_____	② ✓	② ✓
	_____	③ ✓	③ ✓
Counsel for Officers:	_____	① ✓	M Anderson 4/3/2023
	_____	② ✓	
	_____	③ ✓	
Inquest Program Atty:	① _____	✓	
	② _____	✓	
	③ _____	✓	

JUROR QUESTION FORM

QUESTION FOR WITNESS: Dr. Magrini
(print witness name)

~~Is there anything you can tell~~

You said Mr. Fredricks was on his stomach briefly. How can you tell it's briefly?

[Inquest Office Use Only – please do not write below this line]

Objection

No Objection

Question Asked?

Counsel for SPD:

Yes No
M Anderson
4/3/23

Counsel for Officers:

Inquest Program Atty:

JUROR QUESTION FORM

QUESTION FOR WITNESS: Dr. Mazrim
(print witness name)

1. You mentioned about fracture of ribs of Mr. Fredricks body. Is it possible that it's caused by the officer's force?

This question was NOT asked.

Suggest: Can you testify as to what caused ~~the~~ Mr. Fredricks rib fracture?

This question was asked.
M Anderson
4/3/2023

[Inquest Office Use Only - please do not write below this line]

Objection	No Objection	Question Asked?
_____	_____	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

See above
M Anderson

Counsel for SPD:

Objection - speculative -
~~he~~ he testified that he didn't see anything improper by officers

Counsel for Officers:

agree w/ SPD, but OK w/ rewording 2nd sentence

Inquest Program Atty:

Also, it should be phrased "with in a reasonable degree of forensic probability"

JUROR QUESTION FORM

QUESTION FOR WITNESS: Dr. Mazrim
(print witness name)

^{explain/define}
1 → Can you ~~acute~~ meth/alcohol levels
Did tox report show prescription medications
i.e. for High BP?

2 → Did you find external bruising or other markings
consistent with force on Mr. Fredericks
back, arms, legs etc.

3 → In your 21 yrs, is it common that someone on your
slab that had been in custody would have bruising, scrapes
from head to toe as you described? no as asked ~~HA~~

3 → Could delaying CPR been a factor in his death?

[Inquest Office Use Only - please do not write below this line]

	Objection	No Objection	Question Asked?
Counsel for SPD:	① No objection ② Misstates testimony, ending after Scrapes would be fine ③ Objection → ER 702 → outside of testimony ^{scope} scope	_____	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> #1 #2 #3
Counsel for Officers:	① NO object ② NO object ③ object scope; speculation	_____	
Inquest Program Atty:	①	✓	
	②	✓	
	③	✓	

M Anderson
4/3/2023

JUROR QUESTION FORM

QUESTION FOR WITNESS: Dr. Mazrim
(print witness name)

~~Q~~ When you reviewed the body-cam footage, did you make any effort to determine when Albert Fredericks stopped breathing?
~~Q~~ (A prior witness - Vedhaag - stated that he could see the chest moving after Fredericks was restrained ~~in~~ in viewing the body cam footage.)

[Inquest Office Use Only -- please do not write below this line]

	Objection	No Objection	Question Asked? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Counsel for SPD:		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> if entire question read as is M Anderson 4/13/2023
Counsel for Officers:		<input checked="" type="checkbox"/>	
Inquest Program Atty:	MSD	<input checked="" type="checkbox"/>	

JUROR QUESTION FORM

QUESTION FOR WITNESS: Brian Mazrim
(print witness name)

If emergency medical care was rendered sooner (rather than letting 7.5 minutes go by) ^{do you believe} ~~would~~ ^{would} Mr. Friedrichs still have died from the multiple intoxication/HBP?

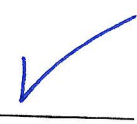
[Inquest Office Use Only -- please do not write below this line]

	<i>Objection</i>	
Counsel for SPD:	He testified that live medical care is outside his scope of expertise. Objection - foundation ER 702 error	
Counsel for Officers:	X ^{speculate} outside scope; barred witnesses	
Inquest Program Atty:		

No Objection	<input checked="" type="checkbox"/>	Question Asked?
		Yes ___ No <input checked="" type="checkbox"/>

*M Anderson
4/3/2023*

IF inclined to overrule the objection we request argument outside the Jury's presence.



JUROR QUESTION FORM

QUESTION FOR WITNESS: Tim Oliverson
(print witness name)

1 Why did you choose not to tell AMR ^{MA} that Mr. Fredricks had been in a long struggle ~~before~~ ^(in a timely manner) before long ^{MA} consciousness? ~~was needed~~

2 Even though you asked AMR ^{EMT's} ~~EMT's~~ ^{MA} ~~was needed~~ ^{appeared} ~~concerned~~, why did you ~~not~~ ^{MA} ask the EMTs to move the ~~body~~ ^{still} ambulance?

3 When you called the Fire department, why did you say he has "low breathing" instead of "no breathing" as the EMT's stated?

4 Why did you say "perfectly fine" ^{to the EMT's} and your only description of the struggle ^{arranging for help} ~~and loss of consciousness~~ was "he ~~started~~ ^{started} breaking out"? ^{At the time, did you believe this was enough information?}

- (Inquest Use Only - please do not write below this line)*
- Counsel for SPD: ^{Objection} ① ^{Vague} Argumentative - propose removing "in a timely manner" ^{No Objection} ③ ✓
- Counsel for Officers: ① agree w/ SPD
2 agree w/ SPD
3 No obj
- Inquest Program Atty: 4 Agree SPD 1

- Question Asked?
Yes No
- # 1 Yes (as modified)
2 Yes (as modified)
3 Yes
4 Yes (as modified)

M Anderson
4/5/2023

Even though you already appeared" should be clarified that it was not known at the time + not known *
SPD ✓

JUROR QUESTION FORM

QUESTION FOR WITNESS: Officer Hay
(print witness name)

#1 Were you surprised or concerned that Mr. Frederiks went from struggling and being vocal to being ~~subdued~~ ^{quiet} and motionless in ~~the~~ such a short amount of time?

#2 Is that common behavior ^{of someone in custody} in your experience?

[Inquest Office Use Only - please do not write below this line]

	Objection	No Objection	Question Asked? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Counsel for SPD:	<hr/> <hr/>	① <input checked="" type="checkbox"/> ② <input checked="" type="checkbox"/>	Q1: Y
Counsel for Officers:	<hr/> <hr/>	① <input checked="" type="checkbox"/> ② <input checked="" type="checkbox"/>	Q2: Y
Inquest Program Atty:	<hr/> <hr/>	① <input checked="" type="checkbox"/> ② <input checked="" type="checkbox"/>	

M Anderson
4/6/2023

JUROR NO. 5

Date: 4/6/23

JUROR QUESTION FORM

general question not for particular witness

QUESTION FOR WITNESS: _____
(print witness name)

What was Mr. Fredricks height and weight?

[Inquest Office Use Only – please do not write below this line]

	<i>Objection</i>	<i>No Objection</i>	<i>Question Asked?</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Counsel for SPD:	_____	<input checked="" type="checkbox"/>	<i>M Anderson 4/6/2023 See Stipulation Ex 103</i>
Counsel for Officers:	_____	<input checked="" type="checkbox"/>	
Inquest Program Atty:	_____	<input checked="" type="checkbox"/>	

We could do a stip?