King County

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 5th day of July, 2022.

Michael Spearman
Inquest Administrator

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

Interrogatory No. 1: On June 18, 2017, at approximately 8:55am, did Charleena Lyles call 911 to report a burglary of her apartment?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 2: Did Seattle Police Department Officer Anderson arrive at Ms. Lyles's apartment building in response to her call to 911?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 3: Upon arrival did Officer Anderson review an Officer Safety Caution notice arising from an incident at Ms. Lyles's apartment on June 5, 2017?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 4: Did the Officer Safety Caution notice advise Officer Anderson that on June 5, 2017, Ms. Lyles had threatened officers with a knife?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 5: Did Officer Anderson review police report(s) arising from an incident at Ms. Lyles's apartment on June 5, 2017?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 6: Did the police report(s) advise Officer Anderson that on June 5, 2017, Ms. Lyles had threatened officers with a large pair of scissors?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 7: Did the police report(s) suggest to Officer Anderson that on June 5, 2017, Ms. Lyles exhibited symptoms consistent with mental instability and delusions?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 8: Was Officer Anderson alerted by the police report(s) from the June 5, 2017 incident that Ms. Lyles might exhibit symptoms of mental instability and delusions on June 18, 2017?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 9: Did Officer Anderson request a back-up officer because of what he read about the June 5, 2017 incident?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 10: Did Officer McNew respond to the call for a back-up officer and arrive at Ms. Lyles' apartment building?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 11: Was Officer McNew certified as a crisis intervention trained (CIT) officer?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 12: Did Officer Anderson discuss what he learned about the June 5, 2017, incident with Officer McNew before approaching Ms. Lyles' apartment building?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 13: Did Officer McNew ask Officer Anderson if Ms. Lyles had a Mental Caution?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 14: Did Officer Anderson respond, "no"?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 15: Did Officer Anderson's description of the June 5, 2017 incident cause Officer McNew to be aware that on June 5, 2017, Ms. Lyles exhibited symptoms consistent with mental instability and delusions?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 16: Was Officer McNew alerted by Officer Anderson's description of the June 5, 2017 incident that Ms. Lyles might exhibit symptoms of mental instability and delusions on June 18, 2017?

YES 4 NO 0 UNKNOWN 2

Interrogatory No. 17: Before they entered the apartment did the officers make a plan that after they entered the apartment, they would not allow Ms. Lyles to get behind them?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 18: Before they entered the apartment did the officers also make a plan that after they entered the apartment, they would not allow Ms. Lyles get between them and the door?

YES 0 NO 0 UNKNOWN 6

Interrogatory No. 19: Was the plan based, in whole or in part, on the officers' awareness that Ms. Lyles had threatened officers with a large pair of scissors on June 5, 2017?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 20: Was the plan based, in whole or in part, on the officers' awareness that Ms. Lyles had exhibited symptoms consistent with mental instability and delusions on June 5, 2017?

YES 3 NO 1 UNKNOWN 2

Interrogatory No. 21: Did Ms. Lyles allow the officers entry into her apartment?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 22: Was Ms. Lyles wearing a knee-length down coat when the officers entered the apartment?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 23: Did Officer Anderson see an infant and a young child in the living room after he entered?

YES 5 NO 0 UNKNOWN 1

Interrogatory No. 24: Did Officer McNew see an infant and a young child in the living room after he entered?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 25: Did Ms. Lyles point out where the reported stolen property had been taken from the living room?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 26: Did Ms. Lyles lead the officers to a back bedroom and point out from where the reported stolen property had been taken?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 27: Did Ms. Lyles lead the officers back to the kitchen area of the apartment?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 28: During the course of his interaction with Ms. Lyles, did Officer Anderson observe Ms. Lyles moving her hands in and out of her coat pockets?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 29: During the course of his interaction with Ms. Lyles, did Officer McNew observe Ms. Lyles moving her hands in and out of her coat pockets?

YES 5 NO 0 UNKNOWN 1

Interrogatory No. 30: Did Officer Anderson ask Ms. Lyles to stop putting her hands in her pockets?

YES 0 NO 4 UNKNOWN 2

Interrogatory No. 31: Did Officer McNew ask Ms. Lyles to stop putting her hands in her pockets?

YES 0 NO 5 UNKNOWN 1

Interrogatory No. 32: After returning to the kitchen area of the apartment, did Ms. Lyles stand near the living room side of the end of the peninsula counter?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 33: After returning to the kitchen area of the apartment, did Officer Anderson stand near the kitchen side of the end of the peninsula counter?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 34: Did Officer McNew take a position inside the kitchen to Officer Anderson's right?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 35: Were there several knives visible at various places on both kitchen counters?

YES 5 NO 0 UNKNOWN 1

Interrogatory No. 36: Did Officer Anderson see the knives on the counters?

YES 0 NO 4 UNKNOWN 2

Interrogatory No. 37: Did Officer McNew see the knives on the counters?

YES 0 NO 4 UNKNOWN 2

Interrogatory No. 38: Was Ms. Lyles calmly and clearly answering questions from both Officer Anderson and Officer McNew about the burglary?

Officer Anderson: YES 6 NO 0 UNKNOWN 0

Officer McNew: YES 6 NO 0 UNKNOWN 0

Interrogatory No. 39: Was Officer Anderson taking notes and unable to maintain constant eye contact with Ms. Lyles?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 40: While Officer Anderson was talking to Ms. Lyles, was Officer McNew observing Ms. Lyles?

YES 5 NO 1 UNKNOWN 0

Interrogatory No. 41: While Officer Anderson was talking to Ms. Lyles at the end of the peninsula, was there a time that Officer McNew turned away from Officer Anderson and Ms. Lyles?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 42: While Officer McNew was turned away from Officer Anderson and Ms. Lyles was he able to see them?

YES 0 NO 6 UNKNOWN 0

Interrogatory No. 43: Did Ms. Lyles demeanor suddenly change from cooperative to hostile and threatening?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 44: Did Ms. Lyles suddenly display a knife in her right hand?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 45: Prior to Ms. Lyles's display of a knife, did Officer Anderson reasonably believe that Ms. Lyles did not pose a threat to the officers?

YES 4 NO 0 UNKNOWN 2

Interrogatory No. 46: Prior to Ms. Lyles's display of a knife, did Officer McNew reasonably believe that Ms. Lyles did not pose a threat to the officers?

YES 4 NO 0 UNKNOWN 2

Interrogatory No. 47: Did Ms. Lyles suddenly thrust a knife towards Officer Anderson's abdomen?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 48: Did Officer Anderson jump back to the pantry door avoid being stabbed?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 49: Did Officer Anderson then move to the entryway to his left to get off-line of Ms. Lyles's attack?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 50: Did Officer McNew see Ms. Lyles display a knife and thrust it at Officer Anderson?

YES 0 NO 3 UNKNOWN 3

Interrogatory No. 51: Did the knife in Ms. Lyles's hand contact Officer Anderson?

YES 0 NO 6 UNKNOWN 0

Interrogatory No. 52: Did Officer Anderson get on the radio and request back up?

YES 5 NO 0 UNKNOWN 1

Interrogatory No. 53: Did Officer Anderson draw his firearm and order Ms. Lyles to get back?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 54: Did Ms. Lyles comply with Officer Anderson's order to get back and step back toward the living room side of the apartment?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 55: Did Officer McNew see any part of this interaction between Officer Anderson and Ms. Lyles.

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 56: Did Ms. Lyles then turn toward Officer McNew from the living room side of the kitchen peninsula?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 57: Did Officer McNew get on the radio, report a woman armed with two knives, and request help?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 58: Did Ms. Lyles raise a knife over her head with her right hand?

YES 3 NO 0 UNKNOWN 3

Interrogatory No. 59: Did Officer McNew believe that Ms. Lyles was going to throw the knife at him from the living room side of the kitchen peninsula?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 60: Did Officer McNew duck down to avoid the knife if it was thrown at him?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 61: When Officer McNew next observed Ms. Lyles was she holding two knives, one in each hand?

YES 3 NO 0 UNKNOWN 3

Interrogatory No. 62: When Officer McNew drew his firearm, did Officer Anderson also have his firearm pointed at Ms. Lyles?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 63: Did Ms. Lyles say to the officers, words to the effect of "Do it."?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 64: Did Officer McNew yell to Officer Anderson, "Taser!"?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 65: Did Ms. Lyles say to the officers, words to the effect of "You can't do that either, motherfuckers"?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 66: Did Officer Anderson respond that he didn't have a Taser?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 67: Did Ms. Lyles move along the edge of the peninsula on the living room side mirroring Officer McNew's movements on the kitchen side of the peninsula?

YES 1 NO 0 UNKNOWN 5

Interrogatory No. 68: Did Ms. Lyles move from the edge of the peninsula on the living room side towards Officer McNew?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 69: As she moved towards Officer McNew, was Ms. Lyles holding one knife in each hand pointed at Officer McNew?

YES 2 NO 0 UNKNOWN 4

Interrogatory No. 70: After Ms. Lyles had begun approaching Officer McNew, could he move out of the kitchen without getting within lunging distance of Ms. Lyles?

YES 0 NO 5 UNKNOWN 1

Interrogatory No. 71: Did Ms. Lyles comply with Officer McNew's orders to get back?

YES 0 NO 5 UNKNOWN 1

Interrogatory No. 72: Did Officer McNew draw his firearm and point it at Ms. Lyles?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 73: Did Officer Anderson fire his handgun four times at Ms. Lyles?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 74: After Officer Anderson first ordered Ms. Lyles to get back, did he give Ms. Lyles any additional orders to get back before he fired his handgun?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 75: Did Officer McNew fire his handgun three times at Ms. Lyles?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 76: Did Officer McNew give multiple orders to Ms. Lyles to get back before he fired his handgun?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 77: After Ms. Lyles's initial compliance with Officer Anderson's order to get back, did Ms. Lyles comply with any additional orders to get back?

YES 0 NO 4 UNKNOWN 2

Interrogatory No. 78: From the time Ms. Lyles displayed a knife until just after shots were fired, were Officer Anderson and Officer McNew able to see each other?

YES 0 NO 6 UNKNOWN 0

Interrogatory No. 79: At the time Officer Anderson fired his handgun, was he aware of where in the living room Ms. Lyles's children were?

YES 3 NO 2 UNKNOWN 1

Interrogatory No. 80: At the time Officer McNew fired his handgun, was he aware of where in the living room Ms. Lyles's children were?

YES 3 NO 2 UNKNOWN 1

Interrogatory No. 81: Did Officer McNew announce over the radio within seconds of shots being fired that Ms. Lyles was down and medics were needed?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 82: At the time Officer Anderson and Officer McNew fired their handguns, was either child in the living room at risk of being struck by a bullet?

YES 2 NO 0 UNKNOWN 4

Interrogatory No. 83: At the time shots were fired, was the front door to Ms. Lyles's apartment open?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 84: When Officer Anderson shot his firearm at Ms. Lyles, was he standing in the open doorway of Ms. Lyles's apartment?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 85: When Officer Anderson shot his firearm at Ms. Lyles, was he standing in the hallway outside Ms. Lyles's apartment?

YES 1 NO 4 UNKNOWN 1

,

Interrogatory No. 86: Did Officer Anderson verbally warn Ms. Lyles, Officer McNew, or others present that he was about to fire his handgun?

YES 0 NO 6 UNKNOWN 0

Interrogatory No. 87: Did Officer Anderson defer shooting a reasonable amount of time to allow Ms. Lyles, Officer McNew, or others present to heed the warning?

YES 4 NO 1 UNKNOWN 1

Interrogatory No. 88: Did Officer Anderson believe that giving a verbal warning would compromise the safety of himself or others?

YES 3 NO 1 UNKNOWN 2

Interrogatory No. 89: Did Officer McNew verbally warn Ms. Lyles, Officer Anderson, or others present that he was about to fire his handgun?

YES 0 NO 6 UNKNOWN 0

Interrogatory No. 90: Did Officer McNew defer shooting a reasonable amount of time to allow Ms. Lyles, Officer Anderson, or others present to heed the warning?

YES 4 NO 1 UNKNOWN 1

Interrogatory No. 91: Did Officer McNew believe that giving a verbal warning would compromise the safety of himself or others?

YES 3 NO 1 UNKNOWN 2

Interrogatory No. 92: Would a Taser have been a reasonably effective alternative to the deadly force used by Officers Anderson and Officer McNew?

YES 0 NO 6 UNKNOWN 0

Interrogatory No. 93: At the time Officer Anderson or Officer McNew fired his handgun at Ms. Lyles, did it appear that a reasonably effective alternative to the use of deadly force existed?

Officer Anderson YES 0 NO 6 UNKNOWN 0

Officer McNew YES 0 NO 6 UNKNOWN 0

Interrogatory No. 94: Was the amount of force used by Officer Anderson or Officer McNew reasonable to effect the lawful purpose intended, as defined in Instruction Nos. 11 and 12.

Officer Anderson YES 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

Interrogatory No. 95: Did bullets fired by Officer Anderson or Officer McNew strike Ms. Lyles?

Officer Anderson YES 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

Interrogatory No. 96: Did Officer Anderson or Officer McNew request or render medical aid for Ms. Lyles as soon as reasonably possible?

Officer Anderson YES 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

Interrogatory No. 97: Did Charleena Lyles die in Seattle, King County, Washington on June 18, 2017?

YES 6 NO 0 UNKNOWN 0

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 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

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 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

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.

Interrogatory No. 100: If you found that **SPD Policy 5.140 – Bias-Free Policing** 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 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

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 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

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 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

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 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

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 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

Interrogatory No. 105: Did **SPD Policy 8.100 – De-Escalation** apply to the actions of the following officers in this incident?

Officer Anderson YES 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

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 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

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 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

Interrogatory No. 108: Did **SPD Policy 8.200 – Use of Force (Sections 1, 3, 4 and 6)** apply to Officer Anderson's or Officer McNew's actions in this incident?

Officer Anderson YES 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

If you found that **SPD Policy 8.200 (Sections 1, 3, 4 and 6)** did not apply to Officer Anderson or Officer McNew, please skip Interrogatories 109 and 110 as to that officer.

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 Anderson YES 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

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 Anderson YES 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

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 6 NO 0 UNKNOWN 0

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.

Interrogatory No. 112: If you found that **SPD Policy 8.300-POL-3 - Use of Force – CEW/CONDUCTED ELECTRICAL WEAPONS (TASER) (Section 3)** applied to the actions of Officer Anderson during the course of this incident, did he comply with the policy?

YES 0 NO 6 UNKNOWN 0

Interrogatory No. 113: If you found that **SPD Policy 8.300-POL-3 - Use of Force – CEW/CONDUCTED ELECTRICAL WEAPONS (TASER) (Section 3)** applied to the actions of Officer Anderson during the course of this incident, were his actions consistent with SPD **training** received as to that policy?

YES 0 NO 6 UNKNOWN 0

Interrogatory No. 114: Did **SPD Policy 8.300-POL-4 – Use of Force - Firearms (Section 7)** apply to the actions of Officer Anderson or Officer McNew in this incident?

Officer Anderson YES 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

If you found that **SPD Policy 8.300-POL-4 – Use of Force - Firearms (Section 7)** did not apply to Officer Anderson or Officer McNew, please skip Interrogatories 115 and 116 as to that officer.

Interrogatory No. 115: If you found that **SPD Policy 8.300-POL-4 – Use of Force - Firearms (Section 7)** applied to the actions of Officer Anderson or Officer McNew during the course of this incident, did that officer comply with the policy?

Officer Anderson YES 4 NO 1 UNKNOWN 1

Officer McNew YES 4 NO 1 UNKNOWN 1

Interrogatory No. 116: If you found that **SPD Policy 8.300-POL-4 – Use of Force - Firearms (Section 7)** 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 Anderson YES 4 NO 0 UNKNOWN 2

Officer McNew YES 4 NO 0 UNKNOWN 2

Interrogatory No. 117: Did **SPD Policy 16.110 – Crisis Intervention** apply to the actions of Officer McNew in this incident?

YES 6 NO 0 UNKNOWN 0

If you found that **SPD Policy 16.110 – Crisis Intervention** did not apply to Officer McNew, please skip Interrogatories 118 and 119.

Interrogatory No. 118: If you found that **SPD Policy 16.110 – Crisis Intervention** applied to the actions of Officer McNew during the course of this incident, did he comply with the policy?

YES 6 NO 0 UNKNOWN 0

Interrogatory No. 119: If you found that **SPD Policy 16.110 – Crisis Intervention** applied to the actions of Officer McNew during the course of this incident, were his actions consistent with SPD **training** received as to that policy?

YES 6 NO 0 UNKNOWN 0

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

Interrogatory No. 120: If you found that Officer Anderson's or Officer McNew's use of deadly force caused the death of Charleena Lyles, was the use of deadly force by that officer justifiable as defined in Instruction Nos. 11 and 12?

Officer Anderson YES 6 NO 0 UNKNOWN 0

Officer McNew YES 6 NO 0 UNKNOWN 0

If you answered "YES" to Interrogatory 120, please skip the remaining interrogatories and sign and return this form.

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 _____

If you answered "NO" to Interrogatory 121, please skip the remaining interrogatories and sign and return this form.

Interrogatory No. 122: 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 not in good faith as defined in Instructions No. 11 and 12?

Officer Anderson YES _____ NO _____ UNKNOWN _____

Officer McNew YES _____ NO _____ UNKNOWN _____

If you answered "NO" to Interrogatory 122, please skip the remaining interrogatory and sign and return this form.

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 6th day of July, 2022.

Erin Hennessey
Panel Foreperson

William D. Pierpoint
Panel Member

Panel Member

Panel Member

Dwight Gary Gilliland
Panel Member

Panel Member

Panel Member

Juror No. 3

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No.__: 18	just remember someone mentioned that "don't let Ms Lyles get between us and the door", but not sure about officer Anderson's or officer McNew's answer.
Interrogatory No.__: 23	officer Anderson mentioned he saw a kid behind her but not sure officer Anderson saw both kids
Interrogatory No.__: 35	These knives are visible from pictures. but might not be seen by a person who doesn't pay attention to it.
Interrogatory No.__: 40	officer McNew start observing environment (360°) when he and officer Anderson were back to kitchen area
Interrogatory No.__: 50	Officer McNew saw Ms Lyles' had 2 knifes in her hands but did not mention he saw Ms Lyles stabbed to officer Anderson or not.

Juror No. 3

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No.__: 52	~~Officer Anderson~~ I Did not hear officer Anderson ~~said~~ ask for back up from the sync vedio.
Interrogatory No.__: 74	This question is asking whether officer Anderson gives "get back" order multiple times?
Interrogatory No.__: 79	~~A~~ According to officer Anderson's tertimony, he was so focus on Ms Lyles. I am not sure whether he knew where the kids were in living room
Interrogatory No.__: 85 ~~86~~ ~~87~~	officer Anderson's one foot stand outside apartment from the sync video
Interrogatory No.__: 87	The time between 2nd warning & firing gun shot is about 4~5 seconds, which is not much time.

Juror No. 3

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No.__: 90	The same reason similiar to question 87. The time between 2nd warning & firing gun shot is about 4-5 seconds, which is not much time.
Interrogatory No.__: 120	According to Instruction No 11 & 12. Both officers asked Ms Lyles to get back, but Ms Lyles continued attacking them. No. 12 (a) The person threatened the officer with a weapon or displayed a weapon in a manner that could reasonably be construced as threatening; or (b) There was probable cause to believe that the person committed any crime involving the infliction or threatened infliction of serious physical harm. Both conditions apply to this situation.
Interrogatory No.__:	
Interrogatory No.__:	
Interrogatory No.__:	

Juror No. 5

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No. 35:	Unknown, the question was unclear as to who it is in reference to, I am unsure that the knives were visable to either officer, based on their location. Overall, some of the knives were visable, but only from some angles in the kitchen.
Interrogatory No. 37:	Unknown, from the CSI images in McNews point of view, which were deemed unreliable, he could not. However, the knives were very close to his line of view, and based on how tall he is, I believe he may have been able to.
Interrogatory No. 40:	Yes, McNew was observing Ms. Lyles at certain points in time, but not all the time.
Interrogatory No. 45:	Unknown, at the time of making the call for a secondary officer, I believe Anderson did believe Lyle's posed a threat. As the officers interacted with her, I believe they reassesed and determined she was no longer a threat.
Interrogatory No. 58:	Unknown, we only have officer McNew's testimony to verify that she held two knives.

Juror No. 5

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No. 61	Unknown, McNew's testimony says he saw two knives, however, the second knife was found in her pocket, it is unknown how it got there. As well, Anderson did not see the second knife
Interrogatory No. 79	Yes, however I believe he didn't know exactly where the children were, but he knew where they weren't, in his line of fire.
Interrogatory No. 80	Yes, Officer McNew knew the children were not in his back drop when he shot, however he didn't know the exact location of the children
Interrogatory No. 82	Unknown, although the children were not in either officers back drop, the officers were unaware of exactly where the children were, putting them at possible risk of being hit by bullets missing the target or passing through the target and island wall.
Interrogatory No. 87	~~No answer~~ Unknown, Anderson did not give a verbal warning that he would fire, therefor no one could heed the warning

Juror No. 5

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No. 110	~~No answer~~ Unknown, McNew did not give a verbal warning that he was going to discharge his weapon, there for could not need warning.
Interrogatory No. 116	Unknown, I am unsure the training provided on scenarios like this, and when they train officers to give verbal warning.
Interrogatory No. ~~118~~ 117 Yes	The policy applied to the situation ~~a~~from the time the knife was pulled
Interrogatory No. 118	Yes, in this situation, officer McNew attempted to de-escalate until it was no longer feasible or reasonable.
Interrogatory No. __:	

Juror No. 6

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No. 8:	I think the "Morph into a wolf" comment "You all are devils" and "KKK" and the Families comment about Ms Lyles rapid ~~or~~ sudden mental decline cause me to believe Anderson was aware
Interrogatory No. 16:	Again the "Morph" comment / Anderson saying Ms Lyles was "talking all crazy". McNew's comment "don't let her get behind us" indicates yes
Interrogatory No. 20:	In part yes: the call for back-up & don't let her get behind us were both responses to that awareness
Interrogatory No. 40:	Yes but perhaps not at every second as he had to also maintain awareness of their surroundings
Interrogatory No. 42:	Based on placard positions & McNew's testimony

Juror No. 6

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No. 45:	I believe the officers continued to assess throughout their encounter with Ms Lyles and to that point had no reason for concern.
Interrogatory No. 50:	Perhaps McNew did not initially see Ms Lyles display the knife but upon hearing the skuffle saw Anderson bailing out & moving off-line
Interrogatory No. 52:	listened carefully to synched audio from officers
Interrogatory No. 58:	We had trouble corroborating this action as both officers did not see this
Interrogatory No. 60:	McNew interviewed same day recalled this major physical reaction to a percieved threat

Juror No. 6

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No. 61:	In the short amount of time uncertain what became of 2nd knife? From Anderson's vantage point 2nd knife not corroborated
Interrogatory No. 67:	Question not concise enough what movement into kitchen or toward end of peninsula not corroborated
Interrogatory No. 80:	He knew where they were but not specifically
Interrogatory No. 82:	We are not balistic experts, it is very hard to speculate. The children were not in their backdrop
Interrogatory No. 85:	One heel outside door. His body mainly inside straddling the threshold.

Juror No. 6

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No. 87:	The warnings were repeated "Get Back" There were several warnings
Interrogatory No. 88:	May not have had time to consciously form that thought
Interrogatory No. 91:	Same as 88 above
Interrogatory No. 96:	Anderson was holding cover until Shickler cleared provided mask to bandage McNew called immediately
Interrogatory No. 115:	I believe they did comply. "Get back" is a warning. And under the exception there was not time and space to for a more specific response

Juror No. 6

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No. 117:	The policy only applied after the knife was pulled. Only then was there a crisis.
Interrogatory No. 118:	CIT was neither feasible or reasonable at that point.
Interrogatory No.__:	
Interrogatory No.__:	
Interrogatory No.__:	

Juror No. 7

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No. 18:	was said in ~~statement~~ officer statement? don't have access to exhibit to confirm
Interrogatory No. 35:	to whom?
Interrogatory No. 40:	at what moment? generally? then yes
Interrogatory No. 42:	at least at one or two moments
Interrogatory No. 46:	at one point they believed she might be a threat later on during the interaction they changed their mind

Juror No. 7

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No. 58:	conflicting testimony
Interrogatory No. 71:	generally but not specifically he knew where they weren't
Interrogatory No. 85:	partially in and out, last shot might have been from hall
Interrogatory No. 96:	anderson could have provided aid more quickly but given him being a rookie cop and being visibly shaken, its not expected that he would be able to
Interrogatory No. 104:	only the SPD talked about the training need a neutral party to evaluate the truth of that statement

Juror No. 7

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No. 16:	no testimony was given about whether this specific policy was emphasized in training and officers would be expected to say these specific words in a high intensity situation
Interrogatory No.__:	
Interrogatory No.__:	
Interrogatory No.__:	
Interrogatory No.__:	

Juror No. 8

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No. 14:	The officer Safety WARNING there was No mental Warning logged just the officer threat
Interrogatory No. 35:	Yes there were a couple knifes located in the kitchen as photographed by C.S.I Report
Interrogatory No. 20:	Yes the plan was made based on the June 5th incident
Interrogatory No. 40:	McNew was observing ms Tyles hands while Anderson took notes and listening to the way she was speaking reading the body language
Interrogatory No. 42:	OFFICER McNew was looking away as he was starting his 360° scan of the apartment, in that moment he was not focused on Anderson

Juror No. 8

JUROR EXPLANATION FORM

If desired, you may provide a written explanation of any of your answers to the interrogatories. You need only provide a written explanation when you believe that a written explanation of your answer would provide information helpful in explaining or interpreting your answer.

Interrogatory No. 79:	He did not know where the children were at Specifically but he did know where they weren't but not in his basic drop of When he fired and in his testimony he waited as long as he could before firing
Interrogatory No. 80:	McNew was AWARE that the kids were in the living Room and were not in his line of fire.
Interrogatory No. 85:	NO Because he wasn't fully standing in the hallway he had a foot in the hallway but not his entire body
Interrogatory No. 96:	OFFICER Anderson provided AID AS SOON as he was done holding cover and the Crime was secured
Interrogatory No. 117-118-119:	McNew Followed training as best as he could even though he was not expecting the knife Attack, he managed to create distance and utilized cover.