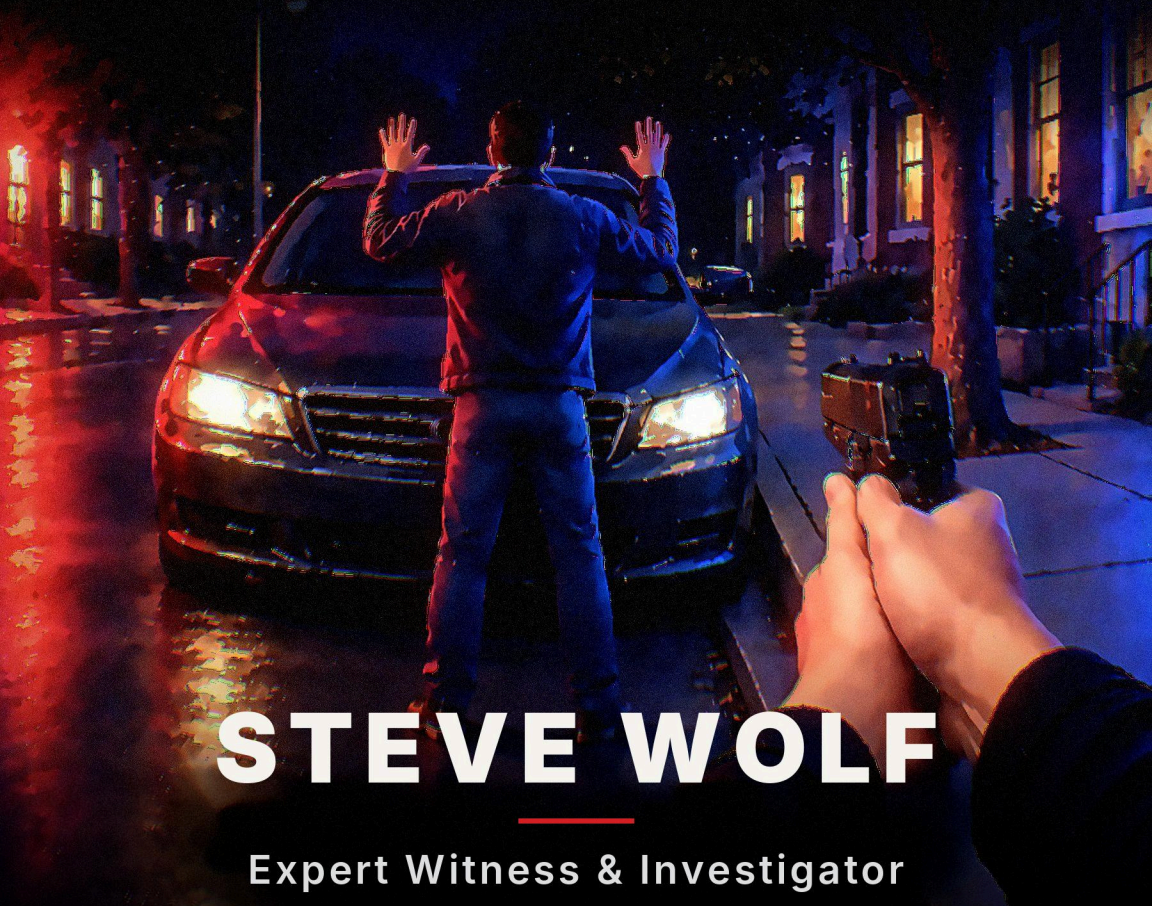
BAD SHOOT

A guide to investigating and litigating unjustified law-enforcement shootings



STEVE WOLF

Expert Witness & Investigator

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Research edition · November 14, 2026

BAD SHOOT

Steve Wolf
Research edition, November 14, 2026
The free online edition is available at bad-shoot.netlify.app.

LEGAL AND TECHNICAL USE

Legal standards depend on the jurisdiction, incident date, defendant, claim, and procedural posture. Counsel must verify controlling authority, subsequent history, filing requirements, and the law in effect when the shooting occurred before using any proposition in a filing. Technical findings require qualified examiners, adequate evidence, and reliable methods applied to the particular event.

The research includes selected judicial opinions, statutes, rules, agency materials, technical guidance, published data, and the supplied reference sites. It does not include a comprehensive commercial-citator review, a fifty-state survey, or independent examination of the original evidence in the reported shootings. The forms contain proposed language for adaptation, not completed pleadings or legal authorizations.

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INTRODUCTION

Police killings since 2013 and what changed in 2025

Police in the United States killed at least 1,314 people in 2025. (Mapping Police Violence, 2025 year-end report) Gunfire was the lethal force in 87% of those incidents. (Mapping Police Violence) The 2025 total was 5% below the 2024 total of 1,383, and the decline was the first year-over-year drop in six years. (Mapping Police Violence) One year of decline does not reverse the longer pattern. The annual rate of police killings stayed near 0.345 per 100,000 residents from 2013 through 2020, rose slightly in 2021, and rose more sharply beginning in 2022. (Mapping Police Violence)

Mapping Police Violence is an advocacy organization as well as a data project. Its year-end report also calls for the abolition of Immigration and Customs Enforcement. (Mapping Police Violence) Its counts come from public reporting, and its records change when new information arrives. (Mapping Police Violence, methodology) Use the figures for what they measure: publicly reported deaths caused by police force, whether or not any authority later found the force justified. (Mapping Police Violence, methodology) The figures are not a count of unconstitutional shootings.

Why the rate rose

No single cause explains the rise after 2021. Changes in violent crime, call volume, staffing, training, recruitment standards, the number of armed encounters, and the completeness of public reporting can each move the count. A litigator who assigns the national trend to one cause invites a cross-examination that the data cannot answer. The useful question in a particular case is narrower: what the agency knew, what it trained, what it permitted, and what the officer faced.

The national numbers still show where the risk concentrates. In 2025, 66% of police killings followed an officer's response to a call for service. (Mapping Police Violence) One in five people killed showed symptoms of mental or behavioral health problems, and 89% of those deaths (231 of 260) followed a call for service. (Mapping Police Violence) Many of these shootings began with a request for help, not with a reported crime in progress.

What changed after January 2025

Three changes since January 2025 bear on investigation and litigation. Each change has a stated policy rationale, and each affects what evidence and oversight remain available.

First, the federal accountability infrastructure contracted. On January 20, 2025, Executive Order 14148 revoked Executive Order 14074, the 2022 order that directed creation of the National Law Enforcement Accountability Database for federal officer misconduct. (Congressional Research Service) The Bureau of Justice Statistics states that the database is no longer active and has been decommissioned. (Bureau of Justice Statistics) The Washington Post's Fatal Force project no longer adds shootings after its 2015 through 2024 coverage period. (Washington Post) The FBI's August 2025 use-of-force release reported participation below the threshold required to publish national incident counts. (FBI)

Second, federal pattern-or-practice oversight of local departments narrowed. On April 28, 2025, Executive Order 14288 directed the Attorney General to review federal consent decrees with state and local law enforcement agencies and to modify, rescind, or conclude measures that "unduly impede" law enforcement. (Executive Order 14288) The same order directed a mechanism to provide legal resources and indemnification to officers who incur expenses and liabilities for official actions. (Executive Order 14288) On May 21, 2025, the Justice Department moved to dismiss its lawsuits against the Louisville and Minneapolis police departments, close the underlying investigations, and retract the earlier findings of constitutional violations. (Justice Department) The Department described those decrees as unjustified federal micromanagement. (Justice Department) Minneapolis remains

under a separate agreement with the Minnesota Department of Human Rights, and city officials pledged to carry out the federal reforms anyway. (PBS NewsHour, Associated Press)

Third, federal immigration enforcement expanded into the interior. The 2025 reconciliation law gave ICE about $75 billion over four years, including about $30 billion for hiring and operations and $45 billion for detention. (PBS NewsHour) ICE reported in January 2026 that it had hired 10,000 new officers and agents and more than doubled its workforce to 22,000. (Detroit Free Press) Immigration agents then shot at dozens of people in neighborhoods, traffic stops, and homes. (The Trace) Those shootings raise questions about remedies, immunity, and evidence access that a local police shooting does not.

Countervailing facts

Not every measure points in one direction. Mapping Police Violence reports that the share of killings in which an officer faced criminal charges rose from about 2% in earlier estimates to about 4% for 2019 through 2023. (Mapping Police Violence) Several states have enacted their own standards and remedies, including California's necessity standard and Colorado's state-law claim without a qualified-immunity defense. (California Penal Code § 835a; C.R.S. § 13-21-131) Body-worn cameras and bystander phones now record many encounters from several angles. (Stanford Law School) The 988 crisis line, launched July 16, 2022, gives callers an alternative to 911 for a mental-health emergency. (Associated Press)

How to use the chapters that follow

The chapters follow the order of the work. Part One defines the claim, the numbers, the standard, the defendant, and the remedy, including a chapter on federal immigration-enforcement shootings. Part Two covers preservation and physical evidence. Part Three reconstructs the threat in recurring settings, including vehicles, multiple shooters, and mental-health crisis calls. Parts Four and Five address the agency, the experts, discovery, summary judgment, damages, and trial. The working documents and the case and counsel directory follow.

The method stays the same in every chapter. Separate fact from allegation. Identify the defendant and the remedy before drafting. Preserve the evidence before interpreting it. Weigh every competing explanation for the shot, including the explanation the officer gives, and test each one against the physical record.

SOURCES

1. **Mapping Police Violence, 2025 year-end report** https://mappingpoliceviolence.org/files/mpv-year-end-report-2025.pdf
2. **Mapping Police Violence, methodology** https://mappingpoliceviolence.org/files/MappingPoliceViolence_Methodology.pdf
3. **Congressional Research Service** https://www.congress.gov/crs-product/IN12515
4. **Bureau of Justice Statistics** https://bjs.ojp.gov/national-law-enforcement-accountability-database
5. **Washington Post** https://www.washingtonpost.com/graphics/investigations/police-shootings-database/
6. **FBI** https://www.fbi.gov/news/press-releases/fbi-releases-use-of-force-data-update
7. **Executive Order 14288** https://www.federalregister.gov/documents/2025/05/02/2025-07790/strengthening-and-unleashing-americas-law-enforcement-to-pursue-criminals-and-protect-innocent
8. **Justice Department** https://www.justice.gov/opa/pr/us-department-justices-civil-rights-division-dismisses-biden-era-police-investigations-and
9. **PBS NewsHour, Associated Press** https://www.pbs.org/newshour/politics/justice-department-moves-to-cancel-minneapolis-and-louisville-police-reform-settlements
10. **PBS NewsHour** https://www.pbs.org/newshour/politics/why-do-ice-agents-get-paid-during-the-partial-government-shutdown-but-not-tsa
11. **Detroit Free Press** https://www.freep.com/story/news/politics/2026/02/23/congress-shutdown-dhs-immigration-ice-money/88765192007/
12. **The Trace** https://www.thetrace.org/2025/12/immigration-ice-shootings-guns-tracker/
13. **California Penal Code § 835a** https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=835a.&lawCode=PEN
14. **C.R.S. § 13-21-131** https://colorado.public.law/statutes/crs_13-21-131
15. **Stanford Law School** https://law.stanford.edu/2026/06/22/federalism-and-state-responses-to-ice/
16. **Associated Press** https://apnews.com/article/mental-health-hotline-988-ac50f02b74b8b89be5592be3f3605ff5

PART ONE

The shooting and the claim

CHAPTER 01

The meaning of a bad shoot

Officer Elton Hymon saw Edward Garner near a fence after responding to a reported burglary. (Tennessee v. Garner) Hymon saw no weapon and was reasonably sure Garner was unarmed. (Tennessee v. Garner) When Garner began to climb the fence, Hymon shot Garner in the back of the head. (Tennessee v. Garner) The Supreme Court held that a state could not authorize deadly force merely to prevent the escape of an apparently unarmed, nondangerous suspect. (Tennessee v. Garner, 471 U.S. 1, 3 to 5, 11 to 12, 20 to 22 (1985))

The distinction was not whether an officer had grounds to arrest Garner. (Garner) The distinction concerned the force an officer could use to make that arrest. (Garner) Authority to detain a person does not establish authority to kill that person. (Garner, 7 to 12)

The phrase and its origin

“Bad shoot” is police slang for a shooting regarded as unjustified or questionable. (The Trace, interview with Tom Nolan; Civil Rights Litigation Group) Former Boston police lieutenant Tom Nolan used the expression in an August 17, 2015 interview to describe deadly force considered questionable within police subculture. (The Trace) That interview documents police usage; it does not establish who coined the phrase or when someone first used it.

“Bad shoot” is not the name of a federal cause of action. (Civil Rights Litigation Group) The phrase does not identify the governing duty, defendant, burden of proof, or remedy, and the label alone establishes none of those elements. (Section 1983; Graham)

Separate the findings

A useful investigation replaces the label with separate findings. Identify the act, the person responsible, the applicable requirement, the departure, the resulting injury, and the evidence connecting those propositions. Keep the following decisions separate.

Decision	What must be examined	What the decision does not establish
Constitutional justification	The applicable constitutional protection and the circumstances confronting the officer. (Graham)	Whether every department rule was followed.
Criminal responsibility	The charged statute, required mental state, admissible proof, and criminal burden. (DOJ, Tamir Rice investigation)	The outcome of a separate civil claim.
Policy compliance	The operative agency policy, its scope, exceptions, and the conduct. (DOJ use-of-force policy)	A constitutional violation merely because policy was violated.
Civil liability	The proper claim, defendant, causation, damages, and defenses. (Section 1983; Monell)	A guaranteed recovery from a particular payer.
Technical preventability	The physical sequence, available information, feasible alternatives, and causal mechanisms.	That a safer alternative was legally required.
Organizational responsibility	The relevant decisions about training, dispatch, supervision, staffing, equipment, and review.	Municipal liability without the required policy, culpability, and causal proof. (Canton)

An intentional shot and an unintentional discharge require different inquiries. (Wolf) For an intentional shot, examine the decision to fire and the manner of firing. (Wolf) For an alleged unintentional discharge, examine handling, equipment, mechanical condition, and the circumstances of contact with the trigger or other components. (Wolf) The supplied firearm-handling reference distinguishes these inquiries and identifies cases in which both require examination. (Wolf, Firearm Handling, Use-of-Force, and Bystander Injury Litigation)

An officer can intend to shoot one person and strike another. (Torres v. Madrid; Kilnapp v. City of Cleveland; Hawatmeh v. City of Henderson) The intended target, injured person, purpose of the force, and applicable circuit law then become separate issues. (Torres v. Madrid; Kilnapp v. City of Cleveland; Hawatmeh v. City of Henderson) A bullet wound

does not eliminate the need to analyze whether the injured person suffered a constitutional seizure. (Torres v. Madrid; Kilnapp v. City of Cleveland; Hawatmeh v. City of Henderson)

Use precise conclusions. (Graham; Zorn v. Linton; DOJ) "The agency sustained a policy violation" differs from "a jury found excessive force." "The prosecutor declined charges" differs from "a court found the shooting constitutional." "The officer received qualified immunity" may describe a ruling about clearly established law rather than a ruling that the force was reasonable. (Graham; Zorn v. Linton; DOJ, Tamir Rice investigation)

An allegation is not a finding

Organize the factual record into five categories: established fact, disputed account, allegation, inference, and unknown. Attach a source and record location to each entry. An investigator should be able to identify the basis for a sentence without reconstructing the entire file.

Write "the complaint alleges that the officer fired after the person dropped the object" until stronger evidence supports a different description. If a recording supports the allegation, identify the recording, relevant interval, camera limitations, and any contrary evidence. Do not substitute a lawyer's characterization for the recording.

Treat exculpatory evidence with the same care as evidence supporting the claim. A reconstruction that omits an observed weapon movement or a reliable warning cannot support a dependable opinion. An analysis that assumes a threatening movement because an officer used the word "furtive" has a different but equally serious defect.

SOURCES

1. **Tennessee v. Garner** https://supreme.justia.com/cases/federal/us/471/1/
2. **Civil Rights Litigation Group** https://www.rightslitigation.com/2017/01/06/denver-co-police-misconduct-attorney-what-differentiates-a-good-shooting-from-a-bad-shooting/
3. **Section 1983** https://www.law.cornell.edu/uscode/text/42/1983
4. **Graham** https://www.law.cornell.edu/supremecourt/text/490/386
5. **DOJ, Tamir Rice investigation** https://www.justice.gov/archives/opa/pr/justice-department-announces-closing-investigation-2014-officer-involved-shooting-cleveland
6. **DOJ use-of-force policy** https://www.justice.gov/jm/1-16000-department-justice-policy-use-force
7. **Monell** https://supreme.justia.com/cases/federal/us/436/658/
8. **Canton** https://supreme.justia.com/cases/federal/us/489/378/

9. **Wolf** https://firearms-handling-use-of-force-cases.netlify.app/
10. **Torres v. Madrid** https://supreme.justia.com/cases/federal/us/592/19-292/
11. **Kilnapp v. City of Cleveland** https://www.supremecourt.gov/DocketPDF/25/25A1123/404053/20260409151330331_Kilnapp%20Cert%20Petition%20Extension%20Request%20App%20A.pdf
12. **Hawatmeh v. City of Henderson** https://cdn.ca9.uscourts.gov/datastore/opinions/2025/11/07/24-6146.pdf
13. **Zorn v. Linton** https://www.supremecourt.gov/opinions/25pdf/25-297_bqm2.pdf
14. **The Trace, interview with Tom Nolan** https://www.thetrace.org/2015/08/former-cop-on-subculture-fatal-police-shootings/

CHAPTER 02

What the numbers can establish

Police-shooting datasets count different events. (Washington Post) The Washington Post's Fatal Force project covers civilians fatally shot by on-duty officers from January 1, 2015, through December 31, 2024. (Washington Post) Its published scope excludes non-shooting deaths, fatal shootings by off-duty officers, and deaths in custody outside that definition. (Washington Post) The project no longer adds shootings occurring after its coverage period. (Washington Post, Fatal Force database)

Mapping Police Violence uses a broader definition. (Mapping Police Violence) Its methodology includes fatal applications of force by on-duty and off-duty law enforcement officers whether or not authorities characterize the force as justified. (Mapping Police Violence) The organization relies heavily on public reporting, uses successive researcher reviews, and revises records when additional information becomes available. (Mapping Police Violence, methodology)

The FBI's August 28, 2025, use-of-force update reported participation covering 78% of the law enforcement population. (FBI) That release explained that publication of incident counts required 80% coverage, so the release did not provide national incident counts. (FBI) Those percentages describe that release, not an assurance about later participation. (FBI, August 2025 update)

Source	Suitable use	Limitation requiring attention
Washington Post Fatal Force	Historical fatal on-duty shooting research within the published coverage period. (Fatal Force)	Not a current count of all police-caused deaths.
Mapping Police Violence	Locating publicly reported fatal force incidents and examining the dataset's defined outcomes. (Methodology)	Broader than shootings; records depend on public information and change over time.

Source	Suitable use	Limitation requiring attention
FBI National Use-of-Force Data Collection	Examining reported events and characteristics subject to the release's participation rules. (FBI update)	Participation and release thresholds affect what a particular release supports.
BGSU Police Crime Database	Researching criminal arrest cases involving nonfederal sworn officers within the database's stated period. (BGSU Police Integrity Research Group)	An arrest-case database is not a census of unjustified shootings or a measure of every shooting's legality.

Mapping Police Violence's 2025 year-end report identified at least 1,314 people killed by police across all included methods. (Mapping Police Violence) The report attributed gunfire to 87% of fatal incidents and explained that some incidents involved multiple forms of force. (Mapping Police Violence) Do not relabel 1,314 as a count of fatal shootings or convert the rounded percentage into an exact shooting count. (Mapping Police Violence, 2025 year-end report)

The same report listed population-based killing rates of 0.75 per 100,000 Black residents and 0.29 per 100,000 White residents for its 2025 data. (Mapping Police Violence) These are rates for the report's defined fatal-force population, not adjudicated rates of unconstitutional shootings. (Mapping Police Violence) The report describes its population estimates and warns that incident records remain subject to revision. (Mapping Police Violence, 2025 year-end report)

Do not manufacture a national justification rate

The Police Brutality Center article links low criminal arrest frequency to a discussion of shootings deemed justified. (Police Brutality Center; DOJ) Those propositions require different evidence. (Police Brutality Center; DOJ) A decision not to arrest can reflect the applicable criminal elements, available evidence, or prosecutorial assessment; it does not supply a civil merits judgment for every uncharged incident. (Police Brutality Center, justified and unjustified shootings; DOJ, Tamir Rice investigation)

A valid justification study needs an explicit definition of "justified," an identified decision-maker, a time period, a complete denominator, and a method for unresolved cases. A criminal declination, internal find-

ing, immunity dismissal, settlement, and jury verdict cannot occupy one undifferentiated outcome category.

For a litigation dataset, record the date of extraction and preserve the downloaded version. Define whether the unit is an incident, person killed, person injured, officer, lawsuit, claim, or payment. An event involving several victims can produce several lawsuits and one global settlement.

Use statistics to locate questions

Use an agency's prior incidents to identify policies, training subjects, recurring factual patterns, and possible notice. Then obtain the underlying records. Similar wording in news stories does not establish that the incidents involved the same operational failure.

A municipal claim requires evidence connecting an identified policy or custom to the constitutional injury. (Monell; Connick v. Thompson) A pattern supporting a failure-to-train theory must address the relevant deficiency and the notice available to policymakers. (Monell; Connick v. Thompson) A national disparity or an agency's raw incident total does not substitute for those elements. (Monell; Connick v. Thompson)

Keep a data note with the analysis: source, version, definition, exclusions, missing values, denominator, calculation, and intended use. If the calculation concerns all fatal force, label the result "fatal force." If the underlying record does not identify whether a shooting was legally justified, preserve that field as unknown.

SOURCES

1. **Washington Post** https://www.washingtonpost.com/graphics/investigations/police-shootings-database/
2. **Mapping Police Violence** https://mappingpoliceviolence.org/files/MappingPoliceViolence_Methodology.pdf
3. **FBI** https://www.fbi.gov/news/press-releases/fbi-releases-use-of-force-data-update
4. **BGSU Police Integrity Research Group** https://www.bgsu.edu/health-and-human-services/programs/department-of-human-services/criminal-justice/police-integrity-lost/
5. **Mapping Police Violence** https://mappingpoliceviolence.org/files/mpv-year-end-report-2025.pdf
6. **Police Brutality Center** https://policebrutalitycenter.org/police-brutality/justified-vs-unjustified-police-shootings/
7. **DOJ** https://www.justice.gov/archives/opa/pr/justice-department-announces-closing-investigation-2014-officer-involved-shooting-cleveland
8. **Monell** https://supreme.justia.com/cases/federal/us/436/658/
9. **Connick v. Thompson** https://supreme.justia.com/cases/federal/us/563/51/

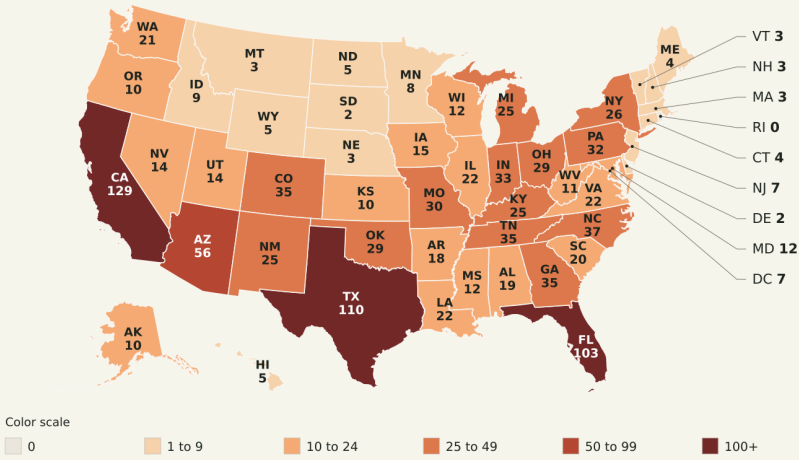
CHAPTER 03

State heat maps: counts and population-adjusted rates

The Mapping Police Violence download contains 1,131 records coded "Gunshot" with incident dates in 2025 across the 50 states and the District of Columbia. Each record represents a person killed, not a lawsuit or a separate shooting incident. (Mapping Police Violence download) These records include on-duty and off-duty officers; the source tracks fatal encounters and acknowledges incomplete case-outcome information. (Mapping Police Violence data definitions)

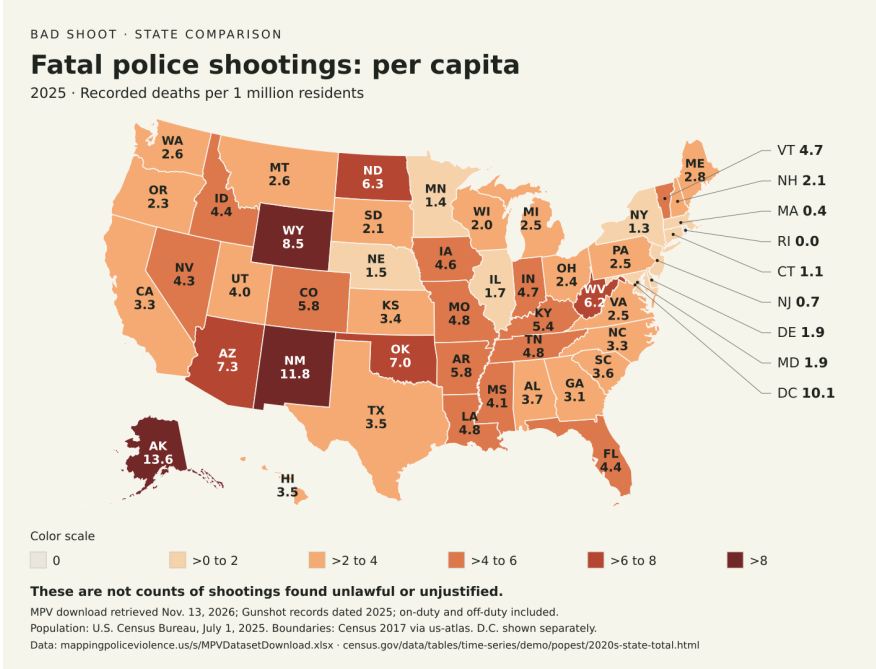
These maps do not measure the number of shootings found unjustified. A pending investigation, absence of criminal charges, allegation in a complaint, or civil settlement does not by itself establish the constitutional justification of a shooting. (DOJ, Tamir Rice investigation; Graham) The selected case directory elsewhere in this book is not the map's numerator.

Raw counts



Raw counts show the recorded number of deaths in each jurisdiction. Use the counts to compare the volume of recorded events, not the lawfulness of police conduct. (Mapping Police Violence download)

Rates per million residents



For each jurisdiction, divide the recorded deaths by the July 1, 2025 resident population and multiply by 1,000,000. The denominator uses the Census Bureau's Vintage 2025 estimates. (Census population file) This crude population rate does not adjust for police contacts, calls for service, age, crime, or exposure to enforcement activity. A small change in deaths can change the rate substantially in a low-population state.

State values and calculation basis

The table uses the same numerator and denominator as the maps. Counts include all records coded exactly "Gunshot"; no duplicate MPV identifiers remain in the selected records. (Shooting records) Population totals for the 50 states and D.C. reconcile to 341,784,857 residents in the Census file. (Census population file)

State or district	Recorded deaths	July 1, 2025 population	Deaths per million
Alabama	19	5,193,088	3.66

State or district	Recorded deaths	July 1, 2025 population	Deaths per million
Alaska	10	737,270	13.56
Arizona	56	7,623,818	7.35
Arkansas	18	3,114,791	5.78
California	129	39,355,309	3.28
Colorado	35	6,012,561	5.82
Connecticut	4	3,688,496	1.08
Delaware	2	1,059,952	1.89
District of Columbia	7	693,645	10.09
Florida	103	23,462,518	4.39
Georgia	35	11,302,748	3.10
Hawaii	5	1,432,820	3.49
Idaho	9	2,029,733	4.43
Illinois	22	12,719,141	1.73
Indiana	33	6,973,333	4.73
Iowa	15	3,238,387	4.63
Kansas	10	2,977,220	3.36
Kentucky	25	4,606,864	5.43
Louisiana	22	4,618,189	4.76
Maine	4	1,414,874	2.83
Maryland	12	6,265,347	1.92
Massachusetts	3	7,154,084	0.42
Michigan	25	10,127,884	2.47
Minnesota	8	5,830,405	1.37
Mississippi	12	2,954,160	4.06
Missouri	30	6,270,541	4.78
Montana	3	1,144,694	2.62
Nebraska	3	2,018,006	1.49
Nevada	14	3,282,188	4.27
New Hampshire	3	1,415,342	2.12
New Jersey	7	9,548,215	0.73
New Mexico	25	2,125,498	11.76
New York	26	20,002,427	1.30

State or district	Recorded deaths	July 1, 2025 population	Deaths per million
North Carolina	37	11,197,968	3.30
North Dakota	5	799,358	6.26
Ohio	29	11,900,510	2.44
Oklahoma	29	4,123,288	7.03
Oregon	10	4,273,586	2.34
Pennsylvania	32	13,059,432	2.45
Rhode Island	0	1,114,521	0.00
South Carolina	20	5,570,274	3.59
South Dakota	2	935,094	2.14
Tennessee	35	7,315,076	4.78
Texas	110	31,709,821	3.47
Utah	14	3,538,904	3.96
Vermont	3	644,663	4.65
Virginia	22	8,880,107	2.48
Washington	21	8,001,020	2.62
West Virginia	11	1,766,147	6.23
Wisconsin	12	5,972,787	2.01
Wyoming	5	588,753	8.49

The workbook was retrieved on November 13, 2026, and its latest incident date was August 18, 2026. The maps select the last completed calendar year, 2025, and do not annualize the partial 2026 records. (Mapping Police Violence download) Historical records can change when the source adds or corrects information; the maps describe this downloaded snapshot, not a guaranteed complete census. The source acknowledges unreported deaths and incomplete outcome information. (Data limitations)

The source's "official disposition" field contains pending-investigation and charging descriptions for the 2025 records. Those entries do not provide a complete state-by-state classification of adjudicated unjustified shootings. (Mapping Police Violence download) Neither the count map nor the rate map estimates that missing classification.

Map boundaries use the Census Bureau's 2017 cartographic state geometry distributed through us-atlas; Alaska and Hawaii appear as insets. (Boundary documentation) D.C. appears as a separately labeled jurisdiction, not a state.

SOURCES

1. **DOJ, Tamir Rice investigation** https://www.justice.gov/archives/opa/pr/justice-department-announces-closing-investigation-2014-officer-involved-shooting-cleveland
2. **Graham** https://www.law.cornell.edu/supremecourt/text/490/386
3. **Mapping Police Violence download** https://mappingpoliceviolence.us/s/MPVDatasetDownload.xlsx
4. **Mapping Police Violence data definitions** https://mappingpoliceviolence.us/aboutthedata
5. **Census population file** https://www2.census.gov/programs-surveys/popest/datasets/2020-2025/state/totals/NST-EST2025-ALLDATA.csv
6. **Boundary documentation** https://github.com/topojson/us-atlas

CHAPTER 04

Intake, parties, and deadlines

Begin with the injured person's condition, available representation, and immediate evidence risks. Obtain the incident date, location, involved agencies, known officers, hospital, case identifiers, and the family's contact information. Determine who can authorize access to medical records and who has authority to act for an estate or minor.

Do not assume that the relative who first calls counsel owns every claim. (42 U.S.C. § 1988(a)) Separate the injured person's claims, estate or survival claims, wrongful-death claims, and any independent claim belonging to a family member. (42 U.S.C. § 1988(a)) Section 1988 can require reference to state law where federal civil-rights law lacks suitable provisions, subject to consistency with federal law. (42 U.S.C. § 1988(a))

Identify the actor before choosing the claim

For each person who used force, record employer, commission or appointment, assignment, command structure, and the legal authority used during the encounter. A uniform does not establish the relevant employer. A task-force badge does not resolve whether a particular act occurred under state or federal authority.

Section 1983 provides a remedy for covered deprivations committed under color of state law. (42 U.S.C. § 1983; Egbert v. Boule) A claim against a federal officer requires a separate remedy analysis; federal employment does not become state action merely because the conduct resembles local policing. (42 U.S.C. § 1983; Egbert v. Boule)

Determine whether the named agency can be sued under applicable law. (Monell) Identify the municipality or other legally proper entity rather than assuming that the words "police department" identify a

separate suable defendant. (Monell) Analyze the officer's individual conduct separately from the entity's policy or custom. (Monell, 690 to 694)

Build a claim-specific calendar

Section 1983 generally borrows the state personal-injury limitations period, while federal law governs accrual. (Wallace v. Kato) Wallace v. Kato describes that distinction in a false-arrest case; its particular accrual holding is not a universal deadline rule for every police-shooting claim. (Wallace v. Kato, 549 U.S. 384 (2007))

State tort claims can have separate notice requirements, immunities, deadlines, and claimant rules. (Felder v. Casey) Felder v. Casey rejected applying Wisconsin's notice-of-claim barrier to a Section 1983 action, but that holding does not erase notice requirements for distinct state-law claims. (Felder v. Casey, 487 U.S. 131 (1988))

For each proposed claim, calendar the incident date, possible accrual dates, limitation period, notice or presentment deadline, service requirement, and the authority for any tolling position. Identify the person responsible for checking each entry. Do not wait for a criminal investigation to finish before investigating civil deadlines.

Intake issue	Record to obtain	Decision requiring counsel
Living injured person	Identity, capacity, medical authorization, representation agreement	Who can authorize representation and records access
Death	Death certificate, appointment documents, family and dependency information	Proper representative, beneficiaries, and distinct claims
Child	Birth record, guardianship or custody records, conflict information	Representative capacity, conflicts, approval requirements
Public defendant	Employment, agency identity, assignment, operative legal authority	Proper defendant, capacity, immunity, notice
Federal involvement	Task-force agreements, deputation, orders, agency records	Available remedy and administrative presentment
Pending criminal case	Charging documents, counsel information, hearing dates	Coordination, privileges, discovery, and any stay request

Preserve client evidence without changing the record

Ask the client to retain original messages, photographs, recordings, devices, clothing, correspondence, and social-media material. Do not instruct the client to delete an unfavorable post or edit a recording for presentation. Identify accounts and devices before automatic deletion or replacement creates a preservation problem.

Keep public advocacy and evidentiary interviewing distinct. Families can have legitimate reasons to speak publicly, but counsel should discuss how statements, shared recordings, and proposed witness summaries may affect the investigation. Do not ask witnesses to agree on a common narrative.

SOURCES

1. **42 U.S.C. § 1988(a)** https://www.law.cornell.edu/uscode/text/42/1988
2. **42 U.S.C. § 1983** https://www.law.cornell.edu/uscode/text/42/1983
3. **Egbert v. Boule** https://supreme.justia.com/cases/federal/us/596/21-147/
4. **Monell** https://supreme.justia.com/cases/federal/us/436/658/
5. **Wallace v. Kato** https://supreme.justia.com/cases/federal/us/549/384/
6. **Felder v. Casey** https://supreme.justia.com/cases/federal/us/487/131/

CHAPTER 05

The constitutional standard

Graham v. Connor requires objective reasonableness under the Fourth Amendment for excessive force used during an arrest, investigatory stop, or other seizure of a free citizen. (Graham) The Court identified the severity of the suspected offense, immediate threat, active resistance, and attempted flight as relevant considerations. (Graham) The analysis concerns the particular circumstances, not a checklist scored by adding points. (Graham, 490 U.S. at 395 to 397)

The reasonable-officer perspective does not make the officer's description conclusive. (Graham) Investigators must establish what the officer knew or could perceive, then compare the account with the available evidence. (Graham) The test disregards underlying good or evil motivation when deciding Fourth Amendment reasonableness, but the facts confronting the officer remain central. (Graham, 396 to 397)

Arrest authority and deadly force are separate

Garner addresses deadly force used to prevent escape. (Garner) The Court required necessity to prevent escape and probable cause to believe the suspect posed a significant threat of death or serious physical injury to the officer or others. (Garner) The opinion also requires a warning where feasible in the circumstances it describes. (Garner, 11 to 12)

A suspected offense matters, but the offense label does not replace the threat analysis. (Garner) Garner rejected the proposition that a suspected nighttime burglary automatically established sufficient danger to justify shooting the apparently unarmed person fleeing over the fence. (Garner, 20 to 22)

Avoid a universal sentence that reduces all deadly-force law to one verbal formula. (Graham; Garner; California Penal Code § 835a; DOJ policy) Distinguish defensive force, dangerous flight, state statutory necessity, agency policy, and the federal constitutional inquiry. (Graham; Garner; California Penal Code § 835a; DOJ policy) State the source and scope of the requirement being applied. (Graham; Garner; California Penal Code § 835a; DOJ policy)

Build an information chronology

For each officer, identify information from dispatch, witnesses, other officers, direct observation, and prior knowledge. Record when the officer received each item and whether the evidence supports receipt before the challenged shot. Do not assign one officer's knowledge to the entire group without examining the legal and factual basis for doing so.

Use concrete descriptions. Replace "the suspect was aggressive" with the observed movement, words, distance, object, direction, and timing. Replace "the officer feared for his life" with the claimed threat and the evidence supporting or contradicting that perception.

Consider competing explanations. A downward movement might reflect reaching for a weapon, complying with a command, losing balance, or protecting an injured body part. The proper analysis depends on what the record establishes about the movement, the officer's view, surrounding events, and available response time.

Policy is not the Constitution

The Department of Justice's use-of-force policy includes requirements concerning necessity, alternatives, warnings, moving vehicles, de-escalation, intervention, and medical aid. (DOJ Justice Manual § 1-16.000) The policy applies within its stated departmental scope and expressly disclaims creation of an enforceable legal or equitable right. (DOJ Justice Manual § 1-16.000) It is not a nationwide statutory rule governing every local officer. (DOJ Justice Manual § 1-16.000)

Use the incident-date policy for the involved agency. Compare a later revision only for a defined purpose, and ask counsel to address its evidentiary treatment. Label each comparison as constitutional law, state law, agency policy, training instruction, or professional guidance.

SOURCES

1. **Graham** https://www.law.cornell.edu/supremecourt/text/490/386
2. **Garner** https://supreme.justia.com/cases/federal/us/471/1/
3. **California Penal Code § 835a** https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=835a.&lawCode=PEN
4. **DOJ policy** https://www.justice.gov/jm/1-16000-department-justice-policy-use-force

CHAPTER 06

The events before the trigger press

In Barnes v. Felix, an officer stopped Ashtian Barnes for suspected toll violations. (Barnes v. Felix) Barnes began driving away, and Officer Roberto Felix stepped onto the vehicle's doorsill before firing into the car. (Barnes v. Felix) The lower courts initially restricted their review to the brief period in which Felix perceived the threat that prompted the shots. (Barnes v. Felix, Supreme Court opinion)

The Supreme Court rejected that "moment-of-threat" restriction. (Barnes) Courts must consider all relevant circumstances, including relevant events leading up to the force. (Barnes) The Court did not decide whether or how an officer's creation of danger changes the reasonableness analysis, and it did not decide that Felix's shooting was unconstitutional. (Barnes)

The subsequent history matters. (Fifth Circuit remand opinion; Supreme Court docket 25-1005) On September 18, 2025, the Fifth Circuit reconsidered the record and again affirmed summary judgment for the defendants, concluding that the record did not establish a constitutional violation. (Fifth Circuit remand opinion; Supreme Court docket 25-1005) The Supreme Court denied the later certiorari petition on April 27, 2026. (Fifth Circuit remand opinion; Supreme Court docket 25-1005)

Reconstruct the approach

Examine dispatch classification, instructions, staging, vehicle placement, approach route, cover, communication, available personnel, and the purpose of immediate contact. Record what was feasible at each stage. Do not assume that time available earlier remained available after an unexpected movement.

Describe an alternative precisely enough to test. “The officer should have de-escalated” does not identify an action. “The officer could have remained behind the concrete barrier while another officer communicated from the covered position” identifies a proposed action, but the analysis still needs sightlines, threat exposure, communication capability, available time, and the governing standard.

Separate three propositions: a different tactic was physically possible; a competent practitioner would have used the tactic under the circumstances; the governing law required the tactic or treats the earlier conduct as relevant to liability. Proof of one proposition does not establish the others.

Do not revive the rejected provocation rule

County of Los Angeles v. Mendez rejected a rule that converted otherwise reasonable force into excessive force merely because officers committed a separate constitutional violation that provoked the confrontation. (Mendez) The Court preserved analysis of distinct constitutional violations and injuries proximately caused by those violations. (Mendez, 581 U.S. 420 (2017))

If the proposed claim concerns an unlawful entry, plead and prove that claim separately. (Mendez) Identify the violated right, applicable immunity issue, and causal connection to the shooting injury. (Mendez) Do not write “unlawful entry, therefore unlawful shooting” as a substitute for those elements. (Mendez)

For a tactical departure, ask the retained specialist to explain the operational mechanism. Identify the information, resource, or physical separation that the proposed practice would have supplied. Test whether the proposed change would have affected the actual threat and whether the evidence permits that conclusion.

SOURCES

1. **Barnes v. Felix** https://www.supremecourt.gov/opinions/24pdf/23-1239_onjq.pdf
2. **Fifth Circuit remand opinion** https://law.justia.com/cases/federal/appellate-courts/ca5/22-20519/22-20519-2025-09-18.html
3. **Supreme Court docket 25-1005** https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/25-1005.html
4. **Mendez** https://supreme.justia.com/cases/federal/us/581/16-369/

CHAPTER 07

Qualified immunity without shortcuts

Qualified immunity concerns an individual official's protection from federal damages liability under the applicable doctrine. (Zorn v. Linton) The analysis separates whether the facts establish a constitutional violation from whether the right was clearly established when the officer acted. (Zorn v. Linton) A court can resolve the clearly-established-law issue without resolving the constitutional merits. (Zorn v. Linton)

The clearly-established-law inquiry requires more than a citation to the general prohibition on unreasonable force. (Zorn) In Zorn v. Linton, the Supreme Court emphasized factual specificity when assessing a wristlock used during a protest arrest. (Zorn) Zorn was not a shooting case, but its treatment of specificity matters when preparing an immunity analysis. (Zorn, decided March 23, 2026)

Compare facts, not case names

Prepare an authority chart with the incident date, precedent date, jurisdiction, procedural posture, material facts, holding, and distinctions. Identify whether the authority existed when the officer acted. A later decision can clarify present doctrine without establishing what the officer should have known years earlier.

Compare the type of threat, weapon position, distance, barriers, commands, movement, visibility, time, and changes before later shots. Include adverse cases. Explain why a difference is legally material rather than describing the favorable case as "similar" without analysis.

Do not assume the defense version of disputed events for summary judgment. (Tolan) Tolan v. Cotton requires courts to credit the nonmovant's evidence and draw appropriate favorable inferences

when resolving genuine factual disputes at that stage. (Tolan) The Court applied that principle to disputed lighting, words, demeanor, and movement in a police shooting. (Tolan, 572 U.S. 650, 656 to 660 (2014))

Keep the city separate

A municipality cannot invoke the officer's good faith as qualified immunity from its own Section 1983 liability. (Owen; Monell) Owen v. City of Independence establishes that distinction. (Owen; Monell) The plaintiff must still prove the requirements for municipal liability rather than relying on the employment relationship. (Owen, 445 U.S. 622 (1980); Monell)

An officer's immunity does not answer every question about the entity claim. (Owen; Monell; Hawatmeh) Determine whether the officer prevailed because there was no constitutional violation, because the law was not clearly established, or for another reason. (Owen; Monell; Hawatmeh) Then analyze the municipal claim under the governing authority and actual basis of the ruling. (Owen; Monell; Hawatmeh)

Document the strongest defense before investing in expensive reconstruction. Identify the factual propositions that would change the immunity analysis and whether obtainable evidence could resolve them. That work helps define the examination, discovery requests, and Rule 56(d) declaration.

SOURCES

1. **Zorn v. Linton** https://www.supremecourt.gov/opinions/25pdf/25-297_bqm2.pdf
2. **Tolan** https://supreme.justia.com/cases/federal/us/572/650/
3. **Owen** https://www.law.cornell.edu/supremecourt/text/445/622
4. **Monell** https://supreme.justia.com/cases/federal/us/436/658/
5. **Hawatmeh** https://cdn.ca9.uscourts.gov/datastore/opinions/2025/11/07/24-6146.pdf

CHAPTER 08

State, federal, and private-actor routes

Federal constitutional law is not the entire liability analysis. State statutes and tort law can impose different requirements, supply different remedies, and create separate defenses. The applicable law depends on the incident date and jurisdiction; a current statute cannot automatically be applied to an earlier shooting.

California Penal Code § 835a uses a necessity standard for specified deadly force and defines an imminent threat through present ability, opportunity, and apparent intent to cause immediate death or serious bodily injury. (California Penal Code § 835a) The statute's totality definition includes conduct leading up to the force. (California Penal Code § 835a) The displayed text includes an amendment effective January 1, 2026, so counsel must obtain the event-date version for an older incident. (California Penal Code § 835a)

Colorado Revised Statutes § 13-21-131 creates a claim against covered peace officers for specified deprivations of rights secured by article II of the Colorado Constitution. (C.R.S. § 13-21-131) The statute states that qualified immunity is not a defense to that claim and provides a two-year commencement period after accrual. (C.R.S. § 13-21-131) The statute also has defined coverage and indemnification provisions; it is not a generic waiver covering every public actor or every tort. (C.R.S. § 13-21-131)

Federal officers require a remedy analysis

Do not copy a Section 1983 complaint and replace the local officer's name with a federal agent's name. (Egbert) Egbert v. Boule refused to extend the implied Bivens damages remedy to the claim against a

Border Patrol agent before the Court. (Egbert) The decision emphasizes the barriers to recognizing new Bivens contexts and the significance of alternative remedial structures. (Egbert, 596 U.S. 482 (2022))

Goldey v. Fields again rejected a proposed Bivens extension in a federal-prison excessive-force case. (Goldey; Egbert) Neither decision supplies a simple nationwide answer that every federal shooting claim fails, but both require counsel to analyze the available cause of action before assuming damages relief exists. (Goldey, June 30, 2025; Egbert)

The Federal Tort Claims Act presents a separate route against the United States for qualifying claims. (28 U.S.C. § 2401(b); 28 U.S.C. § 2675) The claimant must satisfy administrative presentment and exhaustion requirements, including the applicable timing and amount requirements. (28 U.S.C. § 2401(b); 28 U.S.C. § 2675) Section 2401(b) states the two-year presentment and six-month post-denial filing periods; Section 2675 addresses presentment, agency disposition, and the relationship between the administrative demand and later suit. (28 U.S.C. § 2401(b); 28 U.S.C. § 2675)

Administrative presentment requires agency receipt of an executed Standard Form 95 or other written notice accompanied by a money demand in a sum certain. A person presenting the claim for another must identify the representative capacity and provide evidence of authority. (28 C.F.R. § 14.2(a)) If the agency does not finally dispose of the claim within six months, Section 2675 permits the claimant to treat that inaction as a final denial for purposes of filing suit; do not confuse that provision with the separate deadline following a mailed final denial. (28 U.S.C. § 2675(a))

The law-enforcement proviso in Section 2680(h) does not eliminate every FTCA exception. (Martin v. United States; 28 U.S.C. § 2680) Martin v. United States held that the proviso overrides the intentional-tort exception in that subsection, not the discretionary-function exception or all other exceptions. (Martin v. United States; 28 U.S.C. § 2680) Martin also rejected the particular Supremacy Clause defense the lower court had recognized. (Martin v. United States, June 12, 2025; 28 U.S.C. § 2680)

Private guards and mixed assignments

A private guard's shooting ordinarily requires analysis of the applicable state tort, privilege, employer, and premises issues rather than an automatic constitutional claim. (42 U.S.C. § 1983; Wolf) State action must be established before using Section 1983. (42 U.S.C. § 1983; Wolf) Examine any delegated authority, joint operation, off-duty police role, and the conduct actually challenged. (42 U.S.C. § 1983; Wolf, firearm-handling reference)

The same physical evidence can support different legal inquiries. Muzzle direction, trigger contact, sightlines, ammunition, and wound paths remain relevant technical subjects, but those observations do not choose the cause of action. Counsel identifies the legal elements; qualified specialists investigate the technical questions that bear on those elements.

SOURCES

1. **California Penal Code § 835a** https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=835a.&lawCode=PEN
2. **C.R.S. § 13-21-131** https://colorado.public.law/statutes/crs_13-21-131
3. **Egbert** https://supreme.justia.com/cases/federal/us/596/21-147/
4. **Goldey** https://www.supremecourt.gov/opinions/24pdf/24-809_906b.pdf
5. **28 U.S.C. § 2401(b)** https://www.law.cornell.edu/uscode/text/28/2401
6. **28 U.S.C. § 2675** https://www.law.cornell.edu/uscode/text/28/2675
7. **28 C.F.R. § 14.2(a)** https://www.law.cornell.edu/cfr/text/28/14.2
8. **Martin v. United States** https://supreme.justia.com/cases/federal/us/605/24-362/
9. **28 U.S.C. § 2680** https://www.law.cornell.edu/uscode/text/28/2680
10. **42 U.S.C. § 1983** https://www.law.cornell.edu/uscode/text/42/1983
11. **Wolf** https://firearms-handling-use-of-force-cases.netlify.app/

CHAPTER 09

Federal immigration-enforcement shootings

On January 7, 2026, an ICE agent shot and killed Renee Good, a 37-year-old U.S. citizen, in Minneapolis. (Snopes; MPR News) The Minnesota Bureau of Criminal Apprehension withdrew from the investigation the next day. (MPR News) The Bureau stated that the FBI had made itself the sole investigative unit and that state investigators would no longer have access to case materials, scene evidence, or interviews. (MPR News) Homeland Security Secretary Kristi Noem said the Bureau lacked jurisdiction and had not been cut out. (MPR News)

Later that month, a Border Patrol officer fatally shot Alex Pretti, a 37-year-old ICU nurse with a concealed-carry permit who was recording agents. (Associated Press via WAVY; States Newsroom via Government Executive) Federal officers blocked state investigators from the scene even after the state obtained a signed judicial warrant. (Associated Press via WAVY) Minnesota and Hennepin County sued to preserve the evidence, and a federal judge ordered the administration not to destroy or alter evidence related to the shooting. (Associated Press via WAVY)

These two shootings show the problems that set a federal immigration-agent shooting apart from a local police shooting: who investigates, who holds the evidence, who can be sued, and whether a state can prosecute. Neither case has been resolved. As of October 2026, no criminal charge had been filed in either death, and the Hennepin County Attorney said both investigations remained open. (West Central Tribune)

Counts and their limits

No federal agency publishes a current count of shootings by immigration agents. The Trace counted 32 incidents in which immigration agents shot at people after the 2025 deployments began, with 9 people killed and 15 injured, and described its count as likely low because not every shooting is reported. (The Trace) CBS News counted at least 30 shootings, 9 deaths, and 13 injuries. (CBS News) A States Newsroom review published July 20, 2026, counted 22 people shot at during the second Trump administration, 6 killed, and 3 of the dead U.S. citizens. (States Newsroom via Government Executive)

The counts differ because the definitions differ. Some trackers count incidents and others count people. Some include every agency under the Department of Homeland Security, including Homeland Security Investigations agents assigned to crime task forces, and others count only immigration enforcement operations. Record which definition a source uses before citing a number.

For comparison, the most recent DHS report cited by The Trace recorded 5 gun-related use-of-force incidents by ICE agents and 18 by Customs and Border Protection agents in fiscal year 2023. (The Trace) That report did not state where those incidents occurred, how many people were hurt, or whether the people were armed. (The Trace) The two figures are not directly comparable, and neither supports a precise rate of increase.

Vehicle shootings at traffic stops

Most of the recent shootings involved a person in a vehicle. The States Newsroom review found that 19 of 22 incidents involved DHS officers shooting at people in vehicles during traffic stops, and that 4 of the 6 deaths occurred during traffic stops. (States Newsroom via Government Executive) After the second fatal traffic-stop shooting in one week, DHS paused traffic-stop enforcement, and the President ordered the pause lifted. (States Newsroom via Government Executive)

The governing DHS policy prohibits officers from firing at the operator of a moving vehicle unless deadly force is otherwise justified under the policy. (DHS Use of Force Policy, Feb. 6, 2023) It prohibits firing

solely to disable a moving vehicle, and it requires the officer to consider the hazards an out-of-control vehicle poses to officers and bystanders. (DHS Use of Force Policy) A DHS spokesperson stated after the Good shooting that the 2023 policy remained in place. (Associated Press via New Zealand Herald) DOJ policy for its own agents adds an express consideration of moving out of the vehicle's path. (DOJ policy) A federal judge in Chicago noted that the DHS policy does not create a duty to retreat. (Fox 5 New York)

Apply the reconstruction method from the chapter on moving vehicles. Plot the agent's position and the vehicle's path at each shot, and separate a vehicle used as a weapon from a vehicle used to leave. In several cases, independent video did not support the federal account. (States Newsroom via Government Executive) In at least five cases, charges against people shot by federal agents were dismissed after DHS described those people as the aggressors. (States Newsroom via Government Executive) Treat the first official account as one version of events, and test it against the recordings and the physical evidence.

Cameras, masks, and records

ICE policy requires officers to activate body-worn cameras during routine enforcement, arrests, warrant service, and emergency response. (CNN) After a shooting, a committee of ICE officials and lawyers reviews the footage, and the ICE director can block or indefinitely delay public release for "specific and compelling circumstances." (CNN) The Government Accountability Office reported in 2026 that most ICE and CBP offices lacked specific guidance on when personnel should record, and DHS declined to adopt automatic camera activation for ICE. (GAO-26-108157)

Request the camera assignment log, activation metadata, and audit trail for every agent present, not only the footage the agency selects. Identify agents who wore no camera and the reason. Masked or unidentified agents complicate both identification and service of process. California's laws banning masks on federal officers and requiring visible identification have been enjoined. (Stanford Law School) Build the identification record from vehicle plates, radio traffic, task-force rosters, and bystander video.

Who investigates

A local police shooting usually goes to a state investigative agency or a prosecutor's team. A federal immigration-agent shooting may be investigated by the FBI, by Homeland Security Investigations, by the agency's own internal-affairs office, or by several of them at once. (Associated Press via WAVY) In the Pretti shooting, the White House described three federal efforts: a DHS investigation, FBI assistance with physical evidence, and a CBP internal review. (Associated Press via WAVY) A former CBP commissioner questioned whether Homeland Security Investigations had the expertise to lead a shooting investigation. (Associated Press via WAVY)

State access may come late or not at all. In the Good and Pretti cases, two-way evidence sharing with the federal government began in July 2026, six months after the deaths. (Duluth News Tribune) In October 2026, state officials said federal authorities were again withholding evidence. (West Central Tribune) Send preservation demands to every federal component that may hold evidence, and consider a court order early, as Minnesota did. (Associated Press via WAVY)

Civil remedies

Section 1983 reaches persons acting under color of state law, not federal agents enforcing federal law. (42 U.S.C. § 1983) Egbert v. Boule refused to extend the implied Bivens remedy to a claim against a Border Patrol agent, and Goldey v. Fields refused another extension in a prison excessive-force case. (Egbert; Goldey) Do not assume that a Bivens claim exists against an immigration agent who fires a weapon. Analyze the context against the Court's new-context test before filing.

The Federal Tort Claims Act usually provides the primary damages route against the United States for a shooting by a federal agent. (28 U.S.C. § 2675) Present an administrative claim with a sum certain within two years, and file suit within six months after a mailed denial. (28 U.S.C. § 2401(b); 28 C.F.R. § 14.2(a)) Martin v. United States held that the law-enforcement proviso overrides only the intentional-tort exception, so the discretionary-function exception still requires analysis. (Martin v. United States) The FTCA applies the law of the place where the act or omission occurred, so state tort law on assault, bat-

tery, and wrongful death governs the merits. (28 U.S.C. § 1346(b)) Renee Good's family filed two civil lawsuits on October 1, 2026, against the federal government and the agents involved. (West Central Tribune)

State prosecution and Supremacy Clause immunity

A state can charge a federal officer with a state crime. The officer can remove the prosecution to federal court under 28 U.S.C. § 1442 and assert Supremacy Clause immunity. (28 U.S.C. § 1442; In re Neagle) In re Neagle held that a federal marshal who shot and killed a man while protecting a Supreme Court justice could not be held by California for trial. (In re Neagle, 135 U.S. 1 (1890)) Courts generally ask whether the officer was performing an authorized federal duty and whether the conduct was necessary and proper, or reasonable and necessary, to perform that duty. (Stanford Law School) Courts appear to have granted the immunity more often than they have denied it. (Stanford Law School)

The Hennepin County Attorney charged ICE agent Christian Castro on May 18, 2026, with four counts of second-degree assault and one count of falsely reporting a crime. (Hennepin County Attorney) Prosecutors allege that Castro fired through the front door of an occupied home on January 14, 2026, wounding Julio Sosa-Celis, and then falsely claimed that he had been attacked with a broom handle and a snow shovel. (Minnesota Attorney General) Federal prosecutors earlier charged Sosa-Celis and another man with assault, and a federal judge dismissed those charges. (MPR News; PBS NewsHour, Associated Press) The U.S. Attorney later charged Castro with six counts of making false statements to the FBI, but did not charge a civil-rights violation for the shooting. (Minnesota Attorney General; MPR News) Castro has pleaded not guilty to the federal charges and is presumed innocent. (NBC News) DHS called the state prosecution unlawful and said only federal authorities have jurisdiction. (NBC News) Hennepin County also charged a second ICE agent, Gregory Morgan, with two counts of second-degree assault in a separate nonfatal incident. (West Central Tribune)

The Castro case shows the issues to expect: extradition from another state, removal to federal court, an immunity hearing, and parallel federal charges. (MPR News; Tri-City Herald) A state conviction is beyond the reach of a presidential pardon. (Hennepin County Attorney)

Preservation checklist for a federal-agent shooting

- Identify every federal component present: ICE Enforcement and Removal Operations, Homeland Security Investigations, Border Patrol, CBP Office of Field Operations, FBI, U.S. Marshals, and any task force.
- Send written preservation demands to each component, its chief counsel, and the U.S. Attorney's Office.
- Demand body-camera footage, activation logs, and camera assignment records for every agent on scene.
- Request radio and dispatch traffic, operational plans, target packets, and the identity of the intended target.
- Obtain vehicle damage, tire marks, and event-data-recorder data before release or repair of any vehicle.
- Collect bystander video quickly, with original files and metadata.
- Request the agency's use-of-force review and any Office of Inspector General referral.
- Calendar the FTCA two-year presentment deadline from the date of the shooting.
- Track every state investigation, county prosecution, and evidence-access order, because those proceedings can produce records that federal discovery will not.

SOURCES

1. **Snopes** https://www.snopes.com/fact-check/ice-agent-renee-good/
2. **MPR News** https://www.mprnews.org/story/2026/01/08/fbi-will-investigate-after-ice-agent-shoots-renee-good-in-minneapolis
3. **Associated Press via WAVY** https://www.wavy.com/news/politics/ap-what-we-know-about-the-investigations-into-the-minneapolis-shooting-death-of-alex-pretti/
4. **States Newsroom via Government Executive** https://www.govexec.com/management/2026/07/traffic-stops-flashpoint-ice-shootings/414882/
5. **West Central Tribune** https://www.wctrib.com/news/minnesota/state-officials-say-federal-government-is-again-withholding-evidence-in-pretti-and-good-shootings
6. **The Trace** https://www.thetrace.org/2025/12/immigration-ice-shootings-guns-tracker/

7. **CBS News** https://www.cbsnews.com/projects/2026/ice-shooting-tracker/
8. **DHS Use of Force Policy, Feb. 6, 2023** https://www.dhs.gov/sites/default/files/2023-04/23_0206_s1_use-of-force-policy-update.pdf
9. **Associated Press via New Zealand Herald** https://www.nzherald.co.nz/world/minneapolis-shooting-fuels-new-scrutiny-about-ices-tactics-and-training-for-street-encounters/7YRGMZWLBFFEBLMU5DCBUPHRHQ
10. **DOJ policy** https://www.justice.gov/jm/1-16000-department-justice-policy-use-force
11. **Fox 5 New York** https://www.fox5ny.com/news/can-ice-agents-shoot-moving-vehicles-yes-no
12. **CNN** https://www.cnn.com/2026/08/07/us/ice-body-camera-video-policy
13. **GAO-26-108157** https://www.gao.gov/products/gao-26-108157
14. **Stanford Law School** https://law.stanford.edu/2026/06/22/federalism-and-state-responses-to-ice/
15. **Duluth News Tribune** https://www.duluthnewstribune.com/news/minnesota/renee-good-family-files-civil-lawsuits-against-us-federal-agents
16. **42 U.S.C. § 1983** https://www.law.cornell.edu/uscode/text/42/1983
17. **Egbert** https://supreme.justia.com/cases/federal/us/596/21-147/
18. **Goldey** https://www.supremecourt.gov/opinions/24pdf/24-809_906b.pdf
19. **28 U.S.C. § 2675** https://www.law.cornell.edu/uscode/text/28/2675
20. **28 U.S.C. § 2401(b)** https://www.law.cornell.edu/uscode/text/28/2401
21. **28 C.F.R. § 14.2(a)** https://www.law.cornell.edu/cfr/text/28/14.2
22. **Martin v. United States** https://supreme.justia.com/cases/federal/us/605/24-362/
23. **28 U.S.C. § 1346(b)** https://www.law.cornell.edu/uscode/text/28/1346
24. **28 U.S.C. § 1442** https://www.law.cornell.edu/uscode/text/28/1442
25. **In re Neagle** https://supreme.justia.com/cases/federal/us/135/1/
26. **Hennepin County Attorney** https://www.hennepinattorney.org/news/news/2026/May/castro-charges
27. **Minnesota Attorney General** https://ag.state.mn.us/Office/Communications/2026/09/17_Castro.asp
28. **MPR News** https://www.mprnews.org/story/2026/08/30/feds-decline-to-charge-ice-agent-christian-castro-in-sosa-celis-shooting
29. **PBS NewsHour, Associated Press** https://www.pbs.org/newshour/nation/minnesota-county-charges-ice-officer-in-shooting-during-immigration-crackdown
30. **NBC News** https://www.nbcnews.com/news/us-news/bail-set-ice-officer-accused-lying-assault-shooting-minneapolis-rcna598491
31. **Tri-City Herald** https://www.tri-cityherald.com/news/nation-world/national/article315939081.html

PART TWO

Recovering the evidence

CHAPTER 10

Preservation before interpretation

Identify vulnerable evidence before producing an elaborate theory. Recordings can exist in agency systems, vendor platforms, private cameras, personal devices, dispatch systems, hospitals, vehicles, and nearby buildings. Map the custodians and request preservation from the appropriate recipient for each source.

National Institute of Justice guidance directs investigators to work methodically and approach a scene as though the inspection may be the only opportunity to preserve and recover evidence. (NIJ) The guidance also requires attention to applicable law, policy, and the limits of the particular procedure. (NIJ, Crime Scene Investigation guides)

The initial preservation sequence

Use urgency according to the actual retention risk, not a ceremonial deadline. Start with recordings and physical items that face deletion, repair, disposal, cleaning, return to service, or alteration. Counsel should coordinate lawful access and any requested court relief.

- **Recordings:** Identify body cameras, vehicle cameras, surveillance systems, doorbell cameras, phones, dispatch audio, radio channels, interview systems, and evidence-platform copies.
- **Native files:** Request camera-original files, associated metadata, proprietary players, audit history, export logs, and information needed to interpret the files.
- **Physical items:** Identify firearms, magazines, ammunition, holsters, optics, lights, less-lethal devices, clothing, projectiles, cartridge cases, vehicles, and struck surfaces.
- **Agency records:** Identify dispatch events, computer-aided dispatch revisions, GPS records, assignments, use-of-force reports, policy versions, training records, and supervisory communications.

- **Medical records:** Identify emergency dispatch, EMS, hospital, surgical, imaging, pathology, and autopsy custodians.
- **Independent evidence:** Locate witnesses and privately controlled cameras before relying exclusively on the agency's collection.

A preservation request is not a subpoena, inspection order, or guarantee of retention. Track delivery, recipient, scope, response, and unresolved risk. If evidence remains at risk, counsel should consider the available procedural remedy rather than assuming the letter resolved the problem.

Preserve meaning as well as files

Ask for the retention policy, device identifier, assigned user, recording settings, time configuration, and vendor export procedure. (SWGDE) An exported video without the information needed to interpret timing or completeness can leave avoidable uncertainty. (SWGDE) SWGDE recommends obtaining original formats and documenting limitations when the native recording is unavailable. (SWGDE, Digital Forensic Video Analysis)

Create an evidence register. Assign a unique identifier, description, custodian, acquisition date, method, original filename, size, hash where appropriate, storage location, access restrictions, and transfer history. Keep a verified working copy separate from the preserved acquisition.

Do not describe a matching hash as proof that the camera captured the entire event or that the file accurately depicts the scene. A hash comparison supports file identity between the compared versions. Completeness, device operation, timing, and interpretation require additional examination.

Missing evidence needs a documented explanation

Under Rule 37(e), remedies for lost electronically stored information require examination of the preservation duty, reasonable steps, whether the information can be restored or replaced, and prejudice or intent as specified by the rule. (Federal Rule of Civil Procedure 37(e))

An adverse inference or case-ending sanction under subsection (e)(2) requires intent to deprive, not merely a missing recording. (Federal Rule of Civil Procedure 37(e))

Record the expected evidence, basis for expecting it, person responsible, retention settings, requests, responses, and recovery attempts. Separate a device that never recorded from a file that existed and later disappeared. The legal significance may differ, and the technical investigation should not assume the answer.

SOURCES

1. **NIJ** https://nij.ojp.gov/topics/articles/crime-scene-investigation-guides-law-enforcement
2. **SWGDE** https://www.swgde.org/wp-content/uploads/2025/03/2023-03-03-Best-Practices-for-Digital-Forensic-Video-Analysis-18-V-001-2.1.pdf
3. **Federal Rule of Civil Procedure 37(e)** https://www.law.cornell.edu/rules/frcp/rule_37

CHAPTER 11

The scene, the body, and the physical sequence

Obtain lawful access before inspection. Counsel should address owner permission, protective orders, notice to other parties, safety, and restrictions on testing. An expert's assignment does not itself authorize entry, flight, removal of evidence, or destructive examination.

Document the scene before moving objects. Establish a coordinate system, reference points, scale, instrument information, measurement method, and uncertainty appropriate to the task. Preserve overview images, intermediate views, and close views that connect each item to its location.

Reconstruct positions with evidence

Identify candidate locations from recordings, surveyed features, photographs, physical impacts, witness accounts, and medical evidence. State whether a position is measured, reported, estimated, or inferred. Do not draw a precise human outline where the evidence supports only a region.

Distinguish the place a cartridge case was recovered from the location of the firearm at discharge. Consider movement, surface conditions, interference, collection history, and the need for qualified examination. Treat an ejection pattern as a proposition to test, not a geometric certainty.

A line through two bullet defects can support a trajectory analysis under appropriate conditions, but the investigator must examine the material, deflection, damage, alignment, and uncertainty. A drawn line is not proof of the shooter's exact position without a supported connection between the line and the firing event.

Clothing and medical records

Preserve clothing in coordination with the responsible evidence custodian. Document cuts, defects, stains, handling, medical intervention, and packaging. Distinguish a cut made during treatment from damage associated with the discharge.

A qualified medical examiner or other appropriately qualified physician should address wound paths, injury mechanisms, survivability, and medical causation. A firearms specialist should not infer a complete body position from an entry wound without the necessary medical and reconstruction support. A path through the body and a path through the surrounding scene are related but different measurements.

Seek original imaging, operative records, photographs, diagrams, specimen information, and the record of recovered projectiles. Reconcile labels across the hospital, autopsy, laboratory, and police property systems. A projectile attributed to a particular wound needs a traceable evidentiary basis.

Reconstruct the scene at the relevant time

Record changes in lighting, vegetation, parked vehicles, furniture, walls, glazing, pavement, and camera locations. If an inspection occurs months later, document which conditions match the incident and which do not. Weather and a nominal time of day alone do not establish equivalent visibility.

Use laser scanning, photogrammetry, or other measurement methods only within the examiner's qualifications and the method's demonstrated performance. Preserve control measurements and document registration, processing, accuracy checks, and inaccessible areas. A visually detailed model can still contain unsupported geometry.

Give counsel a list of physical findings, limitations, and additional records needed. Do not wait until the final report to disclose that a critical surface was replaced or a camera position could not be established.

CHAPTER 12

Firearm handling and mechanical examination

Identify the firearm by manufacturer, model, caliber, serial number, and relevant configuration. (Wolf) Identify the ammunition, magazine, sights, optic, light, holster, retention features, and any documented modifications. (Wolf) The supplied firearm-handling reference treats equipment, manipulation, and justification as related but separate subjects. (Wolf, firearm-handling reference)

Assign mechanical examination to a qualified examiner. Establish a written protocol before manipulation, cleaning, disassembly, function testing, or live fire. Document the as-received condition and preserve parts, residues, and other evidence that a test could change.

Separate discharge mechanisms

The phrase “the gun went off” leaves the mechanism unspecified. Determine whether the evidence supports intentional trigger operation, unintended trigger contact, mechanical contribution, interference involving a holster or other object, or an unresolved combination.

Do not infer intent solely from the fact that the firearm discharged. Do not infer mechanical failure solely from a witness’s denial of trigger contact. Examine statements alongside physical evidence, video, laboratory findings, configuration, and reproducible testing.

Evaluate firearm handling against a specifically identified source. Obtain the manufacturer’s instructions, incident-date agency rules, training materials, and applicable professional standards. If quoting a safety rule, reproduce the source wording exactly and identify the version.

The decision to fire does not resolve direction

Examine muzzle orientation, target identification, intervening objects, backdrop, adjacent people, and the available firing line. (Kilnapp; Hawatmeh) A claim that force against the target was justified does not establish the path of the actual projectile or resolve a separate claim involving another person. (Kilnapp; Hawatmeh) The bystander analysis also requires the applicable seizure and tort law. (Kilnapp; Hawatmeh)

Do not attribute a projectile to a specific firearm from caliber alone. (NIST Ballistics Toolmark Research Database) Have a qualified firearms examiner identify the comparison method, materials examined, conclusion category, and limits. (NIST Ballistics Toolmark Research Database) NIST's ballistics research describes efforts to develop objective comparison criteria and confidence limits; the existence of toolmarks does not justify an unsupported statement of absolute certainty. (NIST Ballistics Toolmark Research Database)

Reconcile the ammunition record

Construct a round-accounting worksheet for each firearm. Record documented load, recovered live rounds, cartridge cases, projectiles, fragments, observed impacts, reported shots, and any uncertainty about handling after the event. Do not force inconsistent evidence into a single count.

Distinguish the number of discharges from the number of audible impulses, visible flashes, recovered cases, wounds, and bullet fragments. These observations can overlap or differ. Require the examiner to explain each inference rather than treating one count as interchangeable with another.

Testing must answer a defined question. If the question concerns holster interference, an unrelated demonstration of trigger pull adds little. If the question concerns mechanical function, preserve the condition necessary to evaluate the alleged malfunction before a test changes that condition.

SOURCES

1. **Wolf** https://firearms-handling-use-of-force-cases.netlify.app/
2. **Kilnapp** https://www.supremecourt.gov/DocketPDF/25/25A1123/404053/20260409151330331_Kilnapp%20Cert%20Petition%20Extension%20Request%20App%20A.pdf
3. **Hawatmeh** https://cdn.ca9.uscourts.gov/datastore/opinions/2025/11/07/24-6146.pdf
4. **NIST Ballistics Toolmark Research Database** https://www.nist.gov/publications/nist-ballistics-toolmark-research-database-0

CHAPTER 13

Video, audio, and time

Obtain the native recording before making a precise timing claim. (SWGDE) SWGDE's frame-timing guidance warns against conducting frame-timing analysis on transcoded or screen-captured copies and describes format-specific limitations. (SWGDE) A video downloaded from social media is not an adequate substitute for the original file when the proposed opinion depends on precise intervals. (SWGDE, Frame Timing Analysis)

A displayed timestamp and a frame number do not, by themselves, establish real elapsed time. (SWGDE frame timing; SWGDE video analysis) Determine the file structure, actual frame timing, device clock behavior, gaps, edits, and relation between audio and image streams. (SWGDE frame timing; SWGDE video analysis) SWGDE warns that synchronization can drift when different video properties are not accounted for. (SWGDE frame timing; SWGDE video analysis)

Maintain three timelines

- **Event chronology:** Calls, arrivals, movements, commands, shots, aid, and transfers.
- **Information chronology:** What each participant received or observed, with the source and time of receipt.
- **Measurement chronology:** The media timebase, synchronization method, anchors, offsets, drift assessment, and uncertainty.

Keep these timelines linked but separate. A dispatch log can show when information entered a system without proving when an officer heard the information. A waveform can show an impulse without independently identifying the shooter.

Use a qualified multimedia examiner to establish timing relationships. (SWGDE) An apparent common sound does not automatically establish the corresponding video frames across devices. (SWGDE) Validate audio-image relationships and other anchors rather than assuming that each recording's sound is permanently locked to its images. (SWGDE, Digital Forensic Video Analysis)

Measure intervals with honest limits

State the event definitions. "Time to comply" could mean the interval from the start of a command, the end of a command, recognition of the command, or a subsequent opportunity to act. Choose the relevant observable endpoints and explain what the recording cannot establish.

Report a bounded interval when the event occurs between captured frames or behind an obstruction. Distinguish timing precision from behavioral interpretation. A precise timestamp does not establish when the officer perceived a change.

The camera is not the officer's eye

Compare the camera's location and view with the officer's position and plausible line of sight. Examine obstructions, exposure, lens distortion, low-light processing, camera movement, clothing, and the limits of the available recording. Do not claim that an object visible after enhancement was necessarily identifiable to the officer at the scene.

Preserve the original and document processing. (SWGDE video analysis) Identify cropping, enlargement, stabilization, brightness changes, speed changes, overlays, and any other transformation. (SWGDE video analysis) SWGDE requires sufficient documentation for another comparably trained analyst to understand and reproduce the process. (SWGDE video analysis)

Do not use generative reconstruction to invent a hand position, weapon, face, or missing frame and then present the generated detail as evidence. If an illustration depicts an assumption, label the assumption and retain the unaltered source beside the illustration.

Present complete sequences

Begin with normal-speed context before showing a selected frame or slowed segment. Identify the exact interval and the purpose of the selection. Keep the same timebase and labels across versions.

Scott v. Harris permits a court to reject an account that the record blatantly contradicts so that no reasonable jury could believe it. (Scott; Tolan) The decision does not establish that every video resolves every factual dispute. (Scott; Tolan) Tolan requires proper treatment of genuinely disputed facts at summary judgment. (Scott, 550 U.S. 372, 378 to 381 (2007); Tolan)

SOURCES

1. **SWGDE** https://www.swgde.org/documents/published-complete-listing/19-v-005-swgde-best-practice-for-frame-timing-analysis-of-video-stored-in-iso-base-media-file-formats/
2. **SWGDE video analysis** https://www.swgde.org/wp-content/uploads/2025/03/2023-03-03-Best-Practices-for-Digital-Forensic-Video-Analysis-18-V-001-2.1.pdf
3. **Scott** https://supreme.justia.com/cases/federal/us/550/372/
4. **Tolan** https://supreme.justia.com/cases/federal/us/572/650/

CHAPTER 14

Perception, commands, and witnesses

Separate what a person reported seeing from the investigator's interpretation of that report. Record the witness's location, orientation, view, attention, obstructions, hearing conditions, and exposure to later accounts. Ask for concrete observations before supplying terms such as "lunged," "aimed," or "charged."

The NIJ eyewitness guide treats interviewing, recording recollections, and assessing individual elements of a statement as distinct tasks. (NIJ) Apply a documented interview process and preserve the witness's own wording rather than replacing the account with a polished group narrative. (NIJ, Eyewitness Evidence guide)

Interview without supplying the disputed detail

Ask the witness to describe the sequence in the witness's own words. Follow with specific questions about observations and uncertainty. If the witness cannot identify which hand held an object, preserve that uncertainty instead of offering a likely answer.

Distinguish direct observation, inference, information from another person, and later exposure to a recording. Record when the witness first watched public footage or discussed the event. A later accurate description can still require examination of how the witness acquired the information.

Do not treat inconsistency as automatic proof of deception. Identify the disputed detail and test the possible explanations against the record. Conversely, do not excuse a material contradiction merely by invoking stress.

Commands require context

Transcribe commands with the speaker, recipient, words, timing, audibility, competing noise, and any simultaneous instruction. Identify whether the recipient could understand and physically perform the requested action. Separate an officer's utterance from evidence that the recipient heard it.

A command to show hands can conflict with a command to remain motionless. A command to drop an object requires examination of how the object was held and what movement dropping it would require. Document the actual words before criticizing a person for failing to comply.

Human-factors opinions need a defined basis

A qualified human-factors specialist can examine perception, attention, response demands, workload, and the fit between a proposed study and the incident. Do not convert a published average reaction time into an automatic allowance for continued gunfire or an automatic finding that a person had time to comply.

Specify the cue, task, starting posture, visibility, expectation, movement, and equipment. If a demonstration uses a prepared participant who knows the expected signal, identify that difference from an unexpected encounter. Report the limits of the demonstration rather than presenting a favorable result as a reconstruction of another person's mind.

Keep the distinction between observation and opinion visible. "The recording contains no captured warning" is narrower than "no warning occurred." "The available view does not show a raised firearm" is narrower than "the firearm was not raised."

SOURCES

1. **NIJ** https://www.ojp.gov/library/publications/eyewitness-evidence-guide-law-enforcement

PART THREE

Reconstructing the threat

CHAPTER 15

Firearms, knives, replicas, and empty hands

Identify the alleged threat in terms of the object, conduct, direction, distance, barriers, available information, and timing. (Graham) The constitutional inquiry concerns the circumstances confronting a reasonable officer, not the later discovery of a label in a property inventory. (Graham)

Possession and threatening use are different factual propositions. Record whether the object was holstered, carried, raised, pointed, dropped, concealed, or accessible. Identify what the officer could see and when, not merely where investigators later recovered the object.

Mistaken identification

An object can look different from different positions and under different lighting. Obtain the actual object when available, or document the limitations of an exemplar. Preserve the comparison conditions and avoid an enlarged studio photograph as a substitute for the incident view.

Tamir Rice's shooting demonstrates the need to separate information held by dispatch from information relayed to officers. (DOJ) DOJ reported that the caller described the person as probably a juvenile and the gun as probably fake, but the dispatcher did not relay those qualifications. (DOJ) DOJ also described serious limitations in the surveillance footage, including gaps, obstruction, and the inability to see Rice's hands immediately before the shooting. (DOJ, Tamir Rice investigation)

DOJ declined federal charges because prosecutors found insufficient evidence to establish the required criminal violation and willfulness beyond a reasonable doubt. (DOJ) That decision is a criminal charging determination, not a universal answer to every civil, policy, training, or dispatch question arising from the event. (DOJ, Tamir Rice investigation)

A knife does not create a fixed shooting radius

PERF's Guiding Principles on Use of Force criticizes treating the "21-foot rule" as an automatic authorization to shoot a person holding a knife. (PERF) The report recommends evaluating distance, cover, communication, time, and other circumstances rather than converting an old training exercise into a universal rule. (PERF) These are professional recommendations, not a substitute for controlling law. (PERF, Guiding Principles on Use of Force)

Measure the actual distance and path. Identify obstacles, movement, footing, available cover, vulnerable third persons, weapon position, and the opportunity to perceive a change. A stationary person behind a barrier presents a different factual problem from a person moving toward someone within reach.

Do not infer safety solely from distance. Do not infer necessity solely from proximity. The analysis must address the weapon's use, the threatened person's location, the available time, and the information reasonably available to the officer.

Unarmed does not mean every use of deadly force is unlawful

Graham requires an assessment of the actual circumstances, while Garner prohibits shooting an apparently unarmed, nondangerous person merely to prevent escape. (Graham; Garner) Preserve both parts of that analysis. (Graham; Garner) The word "unarmed" alone does not describe the entire encounter, and the word "resisting" alone does not establish a deadly threat. (Graham; Garner)

Use the same discipline for claimed access to an officer's firearm. Establish the firearm's location, retention system, hands, contact, movement, statements, and recording limitations. Do not transform

an unresolved hand movement into a completed disarming attempt.

SOURCES

1. **Graham** https://www.law.cornell.edu/supremecourt/text/490/386
2. **DOJ** https://www.justice.gov/archives/opa/pr/justice-department-announces-closing-investigation-2014-officer-involved-shooting-cleveland
3. **PERF** https://www.policeforum.org/assets/guidingprinciples1.pdf
4. **Garner** https://supreme.justia.com/cases/federal/us/471/1/

CHAPTER 16

Moving vehicles and dangerous flight

Reconstruct the vehicle's movement and the officer's location over time. Obtain available video, scene measurements, vehicle data, damage, tire evidence, and witness accounts. Distinguish measured speed from a visual estimate and identify the assumptions supporting each estimate.

Separate a vehicle used as a threat from a vehicle used to leave the scene. The difference requires more than the officer's use of the word "fleeing." Examine the path, people at risk, acceleration, steering, obstructions, and the officer's position.

Policy and constitutional analysis

DOJ policy prohibits firing solely to disable a moving vehicle and limits shooting at or from moving vehicles under specified conditions. (DOJ policy) Its provisions include examining whether another objectively reasonable defense appears available, including moving out of the vehicle's path. (DOJ policy) Apply that text only within its actual scope or as a clearly identified comparison. (DOJ policy)

Plumhoff v. Rickard concerned a dangerous vehicle pursuit and continued efforts to flee. (Plumhoff) The Supreme Court held that officers justified in firing to end the severe threat did not have to stop until the threat ended on the record before the Court. (Plumhoff) The opinion does not authorize firing at any departing car. (Plumhoff, 572 U.S. 765, 776 to 778 (2014))

Barnes requires examination of relevant events before the shots, including the sequence by which an officer came to occupy a dangerous position. (Barnes) The Supreme Court left unresolved the precise legal treatment of officer-created danger, so the analysis must also address controlling circuit law and the particular record. (Barnes)

Test the claimed path

Plot vehicle and officer positions at supported intervals. Identify whether the officer stood in front of, beside, behind, or on the vehicle at each challenged shot. Include uncertainty instead of drawing one definitive path from incomplete images.

Do not assume a proposed escape route was available because a later photograph shows open pavement. Examine timing, footing, barriers, nearby people, the officer's movement, and the ability to perceive and use the route. Do not assume the opposite merely because the officer reported having no option.

Investigate occupants separately. (Torres; Hawatmeh) Determine whether officers knew or could see that passengers were present, where those passengers were located, and what the firing line crossed. (Torres; Hawatmeh) The legal analysis of injury to a passenger or bystander requires its own seizure, causation, and state-law review. (Torres; Hawatmeh)

Divide the shooting into supported phases

A vehicle's position can change between the first and later rounds. Identify whether the asserted threat continued, changed direction, or ended, and whether the shooter had an opportunity to perceive the change. Do not treat either the first shot or the last frame as an adequate description of the entire sequence.

SOURCES

1. **DOJ policy** https://www.justice.gov/jm/1-16000-department-justice-policy-use-force
2. **Plumhoff** https://supreme.justia.com/cases/federal/us/572/765/
3. **Barnes** https://www.supremecourt.gov/opinions/24pdf/23-1239_onjq.pdf
4. **Torres** https://supreme.justia.com/cases/federal/us/592/19-292/
5. **Hawatmeh** https://cdn.ca9.uscourts.gov/datastore/opinions/2025/11/07/24-6146.pdf

CHAPTER 17

Multiple officers and continued fire

Identify each shooter, firearm, position, available view, information, commands, and proposed shot sequence. Reconcile video and audio with recovered evidence and medical findings. Leave attribution unresolved where the evidence does not support a reliable conclusion.

Do not assume that every officer fired for the same reason. One officer might report seeing a weapon movement, while another reports responding to gunfire. Establish each account and the evidence bearing on the claimed cue.

Analyze threat changes without false precision

Plumhoff states that officers justified in firing need not stop until the threat has ended. (Plumhoff) The Court distinguished a hypothetical second round of fire after clear incapacitation or surrender. (Plumhoff) That distinction directs attention to changes in threat and the evidence of those changes, not a universal permissible shot count. (Plumhoff, 777 to 778)

Identify the start and end of each supported firing interval. Record weapon position, movement, cover, body position, and opportunities for reassessment. Where perception and motor response matter, obtain qualified analysis rather than asserting that an officer could instantly stop upon a change visible in slow motion.

Do not assume that an entire burst was justified because the first round was justified. Do not assume the later rounds were unlawful because an earlier round caused a serious wound. Medical effects, continued movement, apparent threat, timing, and the opportunity to perceive the change all require examination.

Round attribution is a separate problem

A technical opinion about the overall shooting sequence does not automatically establish which officer caused a specific wound. Identify the evidence supporting attribution and the limits of the comparison. Counsel must separately address the legal causation rules applicable to the supported facts.

Prepare a reconciliation table listing each potential discharge, the evidence of that discharge, candidate firearm, possible impact, associated wound if supported, and uncertainty. Include unaccounted rounds and conflicting observations. Do not conceal an attribution gap inside the phrase "the officers shot the decedent."

Intervention requires an opportunity

DOJ policy requires appropriate intervention against excessive or otherwise unlawful or policy-violating force within the policy's scope. (DOJ policy) A litigation claim requires analysis of the applicable law, the officer's knowledge, ability, time, and actual opportunity to intervene. (DOJ policy) An officer's presence alone does not answer those questions. (DOJ policy)

Separate possible intervention before the shooting from intervention during a rapid sequence. A supervisor's planning or communication decision may present a different inquiry from another officer's ability to stop an ongoing discharge. Identify the conduct alleged against each person.

SOURCES

1. **Plumhoff** https://supreme.justia.com/cases/federal/us/572/765/
2. **DOJ policy** https://www.justice.gov/jm/1-16000-department-justice-policy-use-force

CHAPTER 18

Snipers, barricades, and command decisions

A planned position can permit measurement and preparation that a rapidly developing encounter does not. The existence of a long operation does not establish that the final decision was unhurried. Reconstruct the planning period and the final threat separately.

The supplied police-shooting reference identifies sniper-specific evidence concerning optics, observers, communications, authorization, target identification, range, barriers, occupants, and the shooter's actual view. (Wolf) Preserve those subjects rather than treating a sniper shot as an ordinary body-camera case. (Wolf, Investigating and Litigating Police Shootings)

Establish the view through the actual system

Identify the rifle, ammunition, optic, magnification, reticle, mounting, lighting, position, support, range information, and documented zero. Have appropriately qualified examiners determine which characteristics matter to the disputed question. Do not conduct an improvised live-fire reconstruction.

An overview photograph cannot establish what a shooter saw through an optic. Document the available field of view, obstructions, changes in magnification, position, and any recording from the observation system. If the actual optic view was not recorded, identify that limit.

Separate the shooter's observations from the observer's observations. Record what the observer communicated, the exact words, transmission time, and evidence of receipt. An uncommunicated observation cannot be assigned to the shooter simply because both officers participated in the operation.

Authority to fire

Obtain the operation plan, briefing materials, rules or conditions for engagement, communications, supervisory instructions, and any revisions. Determine whether an instruction required further verification, whether the shooter retained independent judgment, and what the participants understood.

Distinguish permission, direction, and acknowledgment. “You are authorized if the hostage is threatened” is not the same instruction as “fire now.” Preserve the exact recording when available, and do not let a later summary replace ambiguous operational language.

The person beyond the target

Map hostages, occupants, nearby officers, and other people relative to the candidate firing line. Examine walls, glass, vehicles, intermediate objects, and the supported projectile path. Assign material and trajectory questions to qualified specialists.

For a shot through a barrier, establish the actual material and condition. An exemplar test should document differences from the incident and avoid an unsupported claim that the test reproduces the original path. Preserve the test record and remnants under an agreed protocol.

Record the observed effect after each shot and any instruction that followed. A command decision, technical shooting error, mistaken identification, or changed threat presents a different factual mechanism. The final report should identify which mechanism the evidence supports and which remain unresolved.

SOURCES

1. **Wolf** https://police-shootings.netlify.app/

CHAPTER 19

Children, disability, and crisis calls

Establish what officers knew about age, disability, crisis, language, medical condition, and the reason for the call. Distinguish information available to the caller, dispatcher, responding officer, supervisor, and specialist. Do not use a diagnosis discovered later as though the officer had received it before arrival.

The Tamir Rice investigation illustrates why the original emergency call, dispatcher's processing, and information actually transmitted require separate preservation. (DOJ) DOJ's account identifies qualifications about possible age and a possible fake gun that the dispatcher did not relay. (DOJ, Tamir Rice investigation)

Examine the assignment

Determine whether the caller requested medical assistance, reported a crime, requested a welfare check, or described an immediate threat. Identify changes in classification and the basis for sending particular personnel. Examine whether additional resources existed, were available, and could have arrived within the relevant period.

PERF recommends communication, distance, cover, and time where circumstances permit, particularly in certain crisis encounters involving people without firearms. (PERF guidance) The guidance does not recommend delaying action against an immediate severe threat. (PERF guidance) Apply its recommendations within that scope rather than treating de-escalation as a result guaranteed by a technique. (PERF guidance)

Evaluate the ability to comply

Identify commands, hearing, language, physical limitations, medication, confusion, pain, and the available time. A medical or human-factors opinion needs an adequate basis for linking a condition to the particular behavior. The existence of a diagnosis alone does not establish what the person could perceive or do.

Do not equate unusual movement with aggression without examining the movement. Do not assume that a person in crisis lacks the ability to cause harm. Describe the specific risk, the possible alternatives, and what the officer reasonably knew.

Keep family claims distinct

The death of a child creates profound loss, but recoverable damages and proper claimants depend on the actual cause of action and applicable law. (42 U.S.C. § 1988; Hawatmeh) Separate the child's injury and any survival claim from the family's wrongful-death or independent constitutional claim. (42 U.S.C. § 1988; Hawatmeh)

Avoid promising that all grief, emotional trauma, or relational loss is recoverable in every jurisdiction. Obtain the controlling statutory provisions and cases before calculating or pleading each category. For a settlement involving a minor or estate, verify representative authority and required approvals.

SOURCES

1. **DOJ** https://www.justice.gov/archives/opa/pr/justice-department-announces-closing-investigation-2014-officer-involved-shooting-cleveland
2. **PERF guidance** https://www.policeforum.org/assets/guidingprinciples1.pdf
3. **42 U.S.C. § 1988** https://www.law.cornell.edu/uscode/text/42/1988
4. **Hawatmeh** https://cdn.ca9.uscourts.gov/datastore/opinions/2025/11/07/24-6146.pdf

CHAPTER 20

Mental-health crisis shootings

On May 20, 2026, Jessica Neal called 911 in Memphis because her 25-year-old son, Jonah, was threatening suicide. (NPR) Federal agents assigned to the Memphis Safe Task Force responded instead of local police. (NPR) A Homeland Security Investigations agent fired, and Jonah Neal died at the scene. (NPR) The Tennessee Bureau of Investigation first said it was unclear whether Neal died from the agent's shot or from self-inflicted stab wounds. (Commercial Appeal) The autopsy later listed the cause of death as a gunshot wound to the neck. (Commercial Appeal) The family's lawyer, after viewing body-camera footage from a second agent, said one agent could be heard saying Neal held a knife, not a gun, seconds before the other agent fired. (NPR) The investigation remains open, and no finding has been made about whether the shot was justified. (Commercial Appeal)

The Neal case contains the recurring elements of a crisis-call shooting: a family member asking for help, a person who is a danger mainly to himself, an edged weapon or a firearm, a short interval, and a dispute about what the responders knew. Mapping Police Violence reports that 20% of the people killed by police in 2025 showed symptoms of mental or behavioral health problems, and that 89% of those deaths followed a call for service. (Mapping Police Violence, 2025 year-end report)

The Fourth Amendment analysis

Mental illness does not create a separate constitutional standard. The force must still be objectively reasonable under the totality of the circumstances. (Graham; Barnes) The Ninth Circuit treats an apparent mental-health crisis as one of those circumstances. In Deorle v. Rutherford, the court refused to create two classes of suspects but held

that, where it is or should be apparent that the person is emotionally disturbed, that fact must be considered in judging the force. (Deorle v. Rutherford, 272 F.3d 1272 (9th Cir. 2001))

Glenn v. Washington County stated that the government's interest in using deadly force is diminished when officers face a mentally ill person who has not committed a serious crime against others, even when that person is acting out and inviting force. (Glenn v. Washington County, 673 F.3d 864 (9th Cir. 2011)) In Vos v. City of Newport Beach, officers shot a mentally unstable man who had cut a store employee's hand with scissors and then charged toward officers holding a metal object over his head. (Vos v. City of Newport Beach, 892 F.3d 1024 (9th Cir. 2018); IMLA; Vos, Bea, J., dissenting) The panel majority held that a jury could find he posed no immediate threat, citing the officers' numbers, cover, and less-lethal options, but granted the officers qualified immunity because the law was not clearly established. (Vos; Los Angeles Times)

The dissent in Vos argued that an attacker's mental illness does not reduce the danger to the officer and may increase it. (Vos, Bea, J., dissenting) Expect the defense to make that argument. The answer lies in the specific record: distance, the weapon, the direction of movement, available cover, the number of officers, and the time available before the shot.

The diminished-interest language comes from Ninth Circuit precedent. Check the controlling circuit's treatment of mental illness before relying on Deorle, Glenn, or Vos elsewhere.

The ADA claim

Title II of the Americans with Disabilities Act prohibits a public entity from discriminating against a qualified person with a disability in its services, programs, or activities. (Congressional Research Service) The Supreme Court took up whether Title II requires officers to accommodate an armed, violent, mentally ill suspect during an arrest in City and County of San Francisco v. Sheehan, but dismissed that question

as improvidently granted. (City & County of San Francisco v. Sheehan, 575 U.S. 600 (2015)) The Court decided only the qualified-immunity question and left the ADA issue open. (Sheehan)

The circuits remain divided. The Fifth Circuit holds that Title II does not apply to an officer's on-the-street response before the scene is secured and no threat to human life remains. (Congressional Research Service) Most circuits that have addressed the question apply Title II to those encounters and treat exigent circumstances as part of the reasonable-accommodation analysis. (Congressional Research Service) Vos applied that approach and reversed summary judgment on the ADA and Rehabilitation Act claims because the officers had time to consider de-escalation, communication, or specialized help. (Vos) A Title II claim runs against the public entity, not individual officers. (E.D. Cal. order, No. 2:15-cv-00720)

The ADA claim does not depend on qualified immunity. In Vos, the individual officers received immunity on the Fourth Amendment claim, while the ADA claim against the city went forward. (Vos) Plead both where the facts support both, and build the record on what accommodations were available, how much time the responders had, and whether the agency trained them to use those accommodations.

Dispatch, assignment, and alternatives

Crisis-call shootings often turn on decisions made before anyone arrives. Obtain the 911 audio, the call-taker's script, the dispatcher's classification, and the units sent. Determine whether a crisis-intervention-trained officer, co-responder clinician, or mobile crisis team existed and was available. In the Neal case, the family asked why Memphis police and a mental-health counselor were not sent. (NPR) Memphis police have crisis-intervention-trained officers, and it was not publicly known whether task-force members had similar training. (WMC via WLOX)

The 988 Suicide and Crisis Lifeline launched nationwide on July 16, 2022, to connect callers with trained crisis counselors instead of police. (Associated Press) Whether a 988 call can trigger a mobile team

depends on local systems. (Los Angeles Times) Find out what the local system offered on the date of the shooting, not what it offers at the time of suit.

The Justice Department and the Department of Health and Human Services issued guidance in 2023 on emergency responses to people with behavioral health or other disabilities. (DOJ and HHS guidance) The guidance addresses co-responder and alternative-responder models and the application of federal disability law. (DOJ and HHS guidance) Executive Order 14074 directed that guidance, and Executive Order 14148 revoked Order 14074. (DOJ and HHS guidance; Congressional Research Service) Confirm the guidance's current status before relying on it as a federal position. Its description of response models remains useful evidence of what was known and feasible.

Federal findings can disappear from the record. The Justice Department's 2023 Minneapolis findings included reasonable cause to believe the city and its police department discriminated against people with behavioral health disabilities when responding to calls. (City of Minneapolis) In May 2025 the Department announced it would retract those findings. (Justice Department) Preserve copies of any findings, monitor reports, and settlement terms that bear on the agency, and identify their current legal status in any filing.

Building the record

PERF recommends communication, distance, cover, and time where circumstances permit, particularly with people in crisis who are not armed with firearms. (PERF guidance) The guidance does not ask officers to delay action against an immediate severe threat. (PERF guidance) Test each recommended tactic against the actual distance, timing, and weapon in the case.

Collect the following:

- The 911 call, call-taker notes, computer-aided dispatch log, and radio traffic.
- Prior calls to the address and any flags in the dispatch system.
- The agency's crisis-response policy, crisis-intervention roster, and the training records of each responder.

- Statements from the family member or caller about what they told dispatch and the responders.
- Body-camera footage from every responder, with timestamps aligned to the dispatch log.
- Medical and mental-health history, obtained through proper authorization, to establish what responders knew and what they could have learned.
- Autopsy findings that separate self-inflicted injuries from injuries caused by officers.

Keep the distinction drawn in the chapter on children, disability, and crisis calls. A diagnosis discovered later does not establish what the officer knew. An officer's claim of surprise does not establish what the caller reported. Lay out each piece of information, who had it, and when.

SOURCES

1. **NPR** https://www.npr.org/2026/07/13/nx-s1-5888618/he-was-having-a-mental-health-crisis-memphis-task-force-agents-came-and-shot-him
2. **Commercial Appeal** https://www.commercialappeal.com/story/news/crime/2026/09/08/jonah-neal-alfonzo-ivy-autopsy-memphis-task-force/91659692007
3. **NPR** https://www.houstonpublicmedia.org/npr/2026/08/23/nx-s1-5936573/body-cam-shows-federal-agent-was-unjustified-in-memphis-shooting-attorney-says
4. **Mapping Police Violence, 2025 year-end report** https://mappingpoliceviolence.org/files/mpv-year-end-report-2025.pdf
5. **Graham** https://www.law.cornell.edu/supremecourt/text/490/386
6. **Barnes** https://www.supremecourt.gov/opinions/24pdf/23-1239_onjq.pdf
7. **Deorle v. Rutherford, 272 F.3d 1272 (9th Cir. 2001)** https://caselaw.findlaw.com/court/us-9th-circuit/1136230.html
8. **Glenn v. Washington County, 673 F.3d 864 (9th Cir. 2011)** https://law.justia.com/cases/federal/appellate-courts/ca9/10-35636/10-35636-2011-12-27.html
9. **Vos v. City of Newport Beach, 892 F.3d 1024 (9th Cir. 2018)** https://law.justia.com/cases/federal/appellate-courts/ca9/16-56791/16-56791-2018-06-11.html
10. **IMLA** https://imla.org/wp-content/uploads/2020/03/article-1991.pdf
11. **Vos, Bea, J., dissenting** https://caselaw.findlaw.com/court/us-9th-circuit/1936840.html
12. **Los Angeles Times** https://www.latimes.com/local/lanow/la-me-ln-newport-beach-police-shooting-court-20180611-story.html
13. **Congressional Research Service** https://www.congress.gov/crs-product/LSB10606
14. **City & County of San Francisco v. Sheehan, 575 U.S. 600 (2015)** https://supreme.justia.com/cases/federal/us/575/600/
15. **E.D. Cal. order, No. 2:15-cv-00720** https://www.govinfo.gov/content/pkg/USCOURTS-caed-2_15-cv-00720/pdf/USCOURTS-caed-2_15-cv-00720-3.pdf
16. **WMC via WLOX** https://www.wlox.com/2026/09/05/autopsy-report-shows-suicidal-man-was-shot-killed-by-memphis-safe-task-force/
17. **Associated Press** https://apnews.com/article/mental-health-hotline-988-ac50f02b74b8b89be5592be3f3605ff5

18. **Los Angeles Times** https://www.latimes.com/california/story/2023-04-13/988-hotline-mental-health-crisis-system-police
19. **DOJ and HHS guidance** https://www.justice.gov/d9/2023-05/Sec.%2014(a)%20-%20DOJ%20and%20HHS%20Guidance%20on%20Emergency%20Responses%20to%20Individuals%20with%20Behavioral%20Health%20or%20Other%20Disabilities_FINAL.pdf
20. **Congressional Research Service** https://www.congress.gov/crs-product/IN12515
21. **City of Minneapolis** https://www.minneapolismn.gov/resident-services/public-safety/police-public-safety/investigations-settlement-agreement/consent-decree/
22. **Justice Department** https://www.justice.gov/opa/pr/us-department-justices-civil-rights-division-dismisses-biden-era-police-investigations-and
23. **PERF guidance** https://www.policeforum.org/assets/guidingprinciples1.pdf

CHAPTER 21

Bystanders, hostages, and unintended victims

Begin with intent, purpose, contact, and control. (Torres v. Madrid) Torres holds that physical force applied to a person with intent to restrain can constitute a seizure even if the person escapes. (Torres v. Madrid) The Court distinguishes force applied accidentally or for a different purpose, and focuses on objectively manifested intent. (Torres v. Madrid)

Unintended-victim cases require further analysis. (Kilnapp) In Kilnapp, the Sixth Circuit held that an intentional firearm discharge in circumstances objectively manifesting intent to restrain effected a seizure of a person struck, even though that person was not the intended target. (Kilnapp) The court nevertheless granted the shooter qualified immunity because the rule was not clearly established at the time of the 2020 shooting. (Kilnapp, February 18, 2026)

The Supreme Court denied the Kilnapp certiorari petition on October 19, 2026. (Supreme Court docket 26-58) The denial did not turn the Sixth Circuit's rule into a nationwide Supreme Court holding. (Supreme Court docket 26-58)

Do not use one nationwide bystander formula

In Hawatmeh, the Ninth Circuit held that officers trying to rescue a child hostage had not seized the child under the circumstances before the court. (Hawatmeh) The court also addressed qualified immunity and rejected the father's substantive due-process claim under the applicable emergency standard. (Hawatmeh, November 7, 2025)

Those decisions require attention to jurisdiction, incident date, purpose of the police action, and factual setting. (Torres; Kilnapp; Hawatmeh) Do not write either "every police bullet is a seizure" or "a bystander can never be seized." Analyze the controlling authority and preserve alternative claims where legally and factually supported. (Torres; Kilnapp; Hawatmeh)

Due process is not ordinary negligence

County of Sacramento v. Lewis requires conscience-shocking conduct for the substantive due-process claim at issue there. (Lewis) In the emergency pursuit setting, the Court required a purpose to cause harm unrelated to a legitimate law-enforcement objective. (Lewis) The Court distinguished circumstances permitting actual deliberation and made clear that negligence is insufficient. (Lewis, 523 U.S. 833, 846 to 854 (1998))

Identify the available deliberation time and the specific challenged conduct before selecting a culpability standard. Do not insert "deliberate indifference" into a complaint merely because the injured person was innocent. Research the governing circuit's treatment of the actual setting.

Preserve the tort analysis

A failed Fourth Amendment theory does not by itself resolve a distinct state tort claim. (Hawatmeh) Examine the relevant duty, privilege, immunity, notice, causation, proper defendant, and available damages. (Hawatmeh) In Hawatmeh, the district court's disposition left state claims dismissed without prejudice to refiling in state court. (Hawatmeh)

Investigate the injured person's location and the supported bullet path with the same rigor used for the intended target. Separate attribution, foreseeability, breach, and legal causation. A tragic outcome establishes injury, not every other element.

SOURCES

1. **Torres v. Madrid** https://supreme.justia.com/cases/federal/us/592/19-292/

2. **Kilnapp** https://www.supremecourt.gov/DocketPDF/25/25A1123/404053/20260409151330331_Kilnapp%20Cert%20Petition%20Extension%20Request%20App%20A.pdf
3. **Supreme Court docket 26-58** https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/26-58.html
4. **Hawatmeh** https://cdn.ca9.uscourts.gov/datastore/opinions/2025/11/07/24-6146.pdf
5. **Lewis** https://supreme.justia.com/cases/federal/us/523/833/

CHAPTER 22

Medical aid and the interval after the shots

Reconstruct the period from injury to treatment. Identify when officers recognized injury, requested medical assistance, controlled remaining hazards, began available care, permitted medical access, and transferred the patient. Preserve dispatch, body-camera, EMS, hospital, and supervisory records.

City of Revere v. Massachusetts General Hospital recognizes a governmental due-process obligation to provide needed medical care to a person injured during apprehension. (City of Revere) The case distinguishes the constitutional obligation to obtain care from the allocation of payment for that care. (City of Revere) It does not define every element of every later medical-care claim. (City of Revere, 463 U.S. 239 (1983))

DOJ policy requires officers within its scope to request or render medical aid where needed. (DOJ policy) The applicable local policy and governing constitutional standard still require separate identification. (DOJ policy)

Explain the interval

Do not label the entire elapsed period "delay" without identifying what occurred. Examine ongoing threats, weapon control, access, officer capability, equipment, communications, and the location of medical personnel. Identify avoidable inactivity only when the evidence supports the description.

Record the actual actions. "Aid was rendered" is incomplete without the person, intervention, time, and source. "The scene was unsafe" requires the claimed hazard and its duration.

Medical causation belongs to qualified clinicians

A longer interval does not by itself establish that earlier care would have changed the outcome. A qualified clinician must address the injuries, available intervention, feasible timing, expected physiological effect, and limits of the record. Separate a departure from an aid policy from causation of additional injury or death.

Preserve both successful and unsuccessful care efforts. A complete review should distinguish the initial shooting injury from any independently supportable injury associated with later conduct. Plead and disclose those theories with the applicable standard rather than treating all post-shooting activity as part of one undifferentiated force claim.

SOURCES

1. **City of Revere** https://supreme.justia.com/cases/federal/us/463/239/
2. **DOJ policy** https://www.justice.gov/jm/1-16000-department-justice-policy-use-force

PART FOUR

The agency and the expert

CHAPTER 23

Investigating a system failure

James Doyle argues that police "bad shoots" should receive a system-level review rather than an inquiry confined to the last seconds or the individual officer. (Doyle) His Commonwealth Beacon essay identifies hiring, training, dispatch, equipment, shift work, medical services, and other contributors as subjects for examination. (Doyle) The essay presents a prevention and accountability argument, not a judicial rule establishing liability. (Doyle, "Every police 'bad shoot' should be treated as a system failure")

Use that broader inquiry without assuming that the agency caused the shooting. Identify specific decisions, available information, failed safeguards, and plausible causal connections. A system review can identify an improvement even when the available evidence does not establish a legal violation.

Follow the event backward

Start with the challenged act and identify the conditions necessary for that act to occur as it did. Trace information, personnel, equipment, authority, and physical opportunity. Ask who controlled each condition and what that person or organization knew before the event.

Operational subject	Records and questions	Causal connection to test
Dispatch	Original call, classification, revisions, transmission, supervision	Whether relevant information was lost, changed, or delayed
Training	Curriculum, scenarios, evaluation, remediation, instructor materials	Whether the alleged deficiency concerned the decision actually made
Equipment	Selection, compatibility, maintenance, warnings, assignment	Whether configuration contributed to the alleged mechanism
Supervision	Briefings, orders, oversight, known performance issues	Whether a decision or omission affected the encounter

Operational subject	Records and questions	Causal connection to test
Staffing	Assignment, workload, available specialists, scheduling	Whether the condition affected a supported perception or response issue
Review	Prior incidents, findings, recommendations, implementation	Whether decision-makers received relevant notice and failed to act

Do not infer fatigue from a schedule alone. Do not infer competence from attendance alone. Do not infer a causal training defect from an unfavorable outcome alone. Each proposed mechanism requires evidence connecting the organizational condition to the event.

Learn from an operational review without adopting its legal conclusion

Tucson's Critical Incident Review Board report for the April 4, 2018, shooting at North Falcon Ridge examined criminal and administrative investigations, witness information, recordings, photographs, and post-shooting conduct. (Tucson CIRB 18-0198) The report identified issues involving scene control, evidence protection, body-camera practice, and medical-response precautions even though the agency found the lethal force within policy. (Tucson CIRB 18-0198)

That example separates an operational finding from a legal outcome. A review can identify improvements without finding that the initial shot was unlawful. Conversely, an agency's internal approval does not replace independent examination of the evidence and the governing legal standard.

Preserve accountability while examining conditions

A systems approach should not erase an individual's act. Identify the officer's decision and the organizational contributions separately. An equipment problem can coexist with a handling departure; a dispatch failure can coexist with an independently unreasonable response.

Doyle recommends non-blaming, forward-looking reviews and broader compensation approaches while retaining criminal and punitive accountability for misconduct. (Doyle) Treat those proposals as

proposals. (Doyle) Whether a particular review receives privilege or confidentiality protection requires its own legal analysis. (Doyle)

Keep the litigation investigation and any collaborative safety review under deliberate legal supervision. Do not promise confidentiality, immunity, or privilege merely because participants call a meeting a "sentinel-event review."

SOURCES

1. **Doyle** https://commonwealthbeacon.org/criminal-justice/every-police-bad-shoot-should-be-treated-as-a-system-failure/
2. **Tucson CIRB 18-0198** https://www.tucsonaz.gov/files/sharedassets/public/v/1/police/documents/frbs/cirb-18-0198.pdf

CHAPTER 24

Proving municipal responsibility

Monell permits Section 1983 liability when an official policy or qualifying custom causes a constitutional injury. (Monell) The municipality is not liable solely because it employed the person who committed the wrong. (Monell) The plaintiff must identify the relevant policy or custom and connect it to the injury. (Monell, 436 U.S. at 690 to 694)

A failed safeguard is an investigative lead. A municipal claim requires the additional legal elements applicable to the proposed theory. Keep direct officer liability, supervisory conduct, state employer liability, and federal municipal liability in separate analyses.

Define the alleged deficiency

"Failure to train" is not a description of what the agency failed to teach. Identify the decision, skill, scenario, information, or evaluation allegedly missing. Compare the actual program with a specifically supported requirement and explain the connection to the incident.

City of Canton v. Harris requires deliberate indifference and a sufficiently close causal relationship between the identified training deficiency and the constitutional harm. (Canton) The Court cautions that an inadequately trained officer, negligent administration, or the possibility that better training might have prevented an injury is not enough by itself. (Canton, 489 U.S. 378, 388 to 392 (1989))

Establish notice

Connick v. Thompson describes a pattern of similar constitutional violations as ordinarily necessary to establish deliberate indifference in a failure-to-train claim. (Connick) The Court preserves a narrow possibility of single-incident liability where the unconstitutional conse-

quences are patently obvious, but does not turn that possibility into a general exception for a serious injury. (Connick, 563 U.S. 51, 61 to 67 (2011))

For each proposed comparator, obtain the underlying record. Identify the conduct, finding, similarity, date, decision-maker, notice, response, and disposition. Distinguish an unsubstantiated complaint from a documented event and explain what the agency knew at the relevant time.

Do not omit an agency's corrective action. Obtain the revised training, attendance, testing, remediation, supervision, and implementation record. The existence and adequacy of a response can affect the proposed notice and causation theory.

Identify the policymaker and mechanism

Determine who had the relevant authority under applicable law. A supervisor's rank or title alone does not establish final policymaking authority. Obtain the governing charter, ordinances, delegations, policies, and decision records.

Describe the causal mechanism in ordinary language. For example, identify a supported policy that directed a particular approach, the officer's reliance on that direction, the resulting position or decision, and the connection to the constitutional injury. Do not skip from "deficient culture" to "liable city."

Test the theory against the contrary record

Ask whether the officer departed from adequate training, whether the claimed deficiency concerned a different event, whether prior incidents supplied meaningful notice, and whether the alleged policy actually influenced the conduct. An expert's criticism of a program must address those alternatives.

Separate safety recommendations from liability opinions. A recommendation to improve training can be sound even when the evidence does not satisfy deliberate indifference. Label the conclusion accurately rather than enlarging the legal claim to match the recommendation.

SOURCES

1. **Monell** https://supreme.justia.com/cases/federal/us/436/658/
2. **Canton** https://supreme.justia.com/cases/federal/us/489/378/
3. **Connick** https://supreme.justia.com/cases/federal/us/563/51/

CHAPTER 25

Retained experts and reliable opinions

Define the technical questions before selecting the expert. A police-practices specialist, firearms examiner, reconstructionist, video analyst, human-factors specialist, physician, economist, and life-care planner perform different work. Match the assignment to demonstrated qualifications rather than a general reputation.

Rule 702 requires the proponent to demonstrate, more likely than not, that the testimony will help the factfinder, rests on sufficient facts or data, results from reliable principles and methods, and reflects a reliable application to the case. (Federal Rule of Evidence 702 and advisory note) The 2023 amendment expressly addresses the court's gatekeeping responsibility for these requirements. (Federal Rule of Evidence 702 and advisory note)

The opinion must survive its assumptions

List the facts, assumptions, measurements, methods, and competing explanations for each opinion. Identify which materials the expert considered, not merely the materials cited in the final report. State how a disputed assumption affects the conclusion.

Do not ask an expert to choose the favored witness as a substitute for analysis. Where two supported versions produce different technical results, explain both. The factfinder's resolution of a factual dispute may determine which conditional analysis applies.

Avoid legal conclusions disguised as technical opinions. Counsel must determine the permissible scope of testimony in the forum. An expert can explain measurements, operational practices, and causal mechanisms without claiming authority to instruct the jury on the law or decide credibility.

Report structure

Organize the report around the event before presenting technical detail. Describe the location, sequence, available information, evidence, applicable technical requirements, departures if supported, causal analysis, competing explanations, and opinions. Place extensive logs, calculations, and source inventories in appendices where appropriate.

For each opinion, state:

- **Question:** The specific issue within the expert's assignment.
- **Basis:** Evidence, measurements, and assumptions.
- **Method:** The procedure and why it fits the question.
- **Application:** How the expert applied the method to the actual evidence.
- **Alternatives:** Material competing explanations and the analysis of each.
- **Limit:** What the evidence does not establish.
- **Conclusion:** A statement no broader than the supported analysis.

Rule 26(a)(2)(B) specifies the required contents of a retained expert's report, including opinions and reasons, facts or data considered, supporting exhibits, qualifications and publications, specified prior testimony, and compensation. (Federal Rule of Civil Procedure 26) Scheduling orders and applicable rules govern disclosure timing and supplementation. (Federal Rule of Civil Procedure 26)

Attorney communications and testing

Rule 26 protects specified draft reports and attorney-expert communications, but the protection has exceptions, including compensation, attorney-provided facts or data considered, and attorney-provided assumptions relied upon. (Rule 26(b)(4)) Do not describe all expert communications or working material as privileged. (Rule 26(b)(4))

Agree on physical testing before potentially destructive work. Identify the examiner, method, sequence, observers, documentation, preservation of remnants, and process for resolving disagreement. Retain raw

results, unsuccessful tests, and the explanation of any departure from protocol.

Pay the expert for time and work, not for reaching a favorable conclusion. If new evidence undermines an opinion, revise the analysis and meet the applicable supplementation duties. A defensible report identifies the change rather than concealing the earlier assumption.

SOURCES

1. **Federal Rule of Evidence 702 and advisory note** https://www.law.cornell.edu/rules/fre/rule_702
2. **Federal Rule of Civil Procedure 26** https://www.law.cornell.edu/rules/frcp/rule_26

PART FIVE

Litigating the record

CHAPTER 26

Discovery that tests a proposition

Tie each request to a material question. (Rule 26(b)(1)) Rule 26 permits discovery of nonprivileged matter relevant to a claim or defense and proportional to the needs of the case. (Rule 26(b)(1)) An unrestricted demand for every record mentioning force is not a substitute for a targeted plan. (Rule 26(b)(1))

Build a request matrix with the proposition, missing fact, likely custodian, record category, time range, requested format, and next step after production. Identify evidence needed for both the favorable theory and the strongest defense. Track incomplete responses by specific omission.

Produce the original structure

For recordings, request native files and the information necessary to interpret them. For policy, request the version in effect, approval history, distribution, acknowledgment, and relevant training. For dispatch, request the original call, event history, edits, transmissions, and associated time information.

For training, distinguish the written curriculum from actual delivery and evaluation. Obtain scenario scripts, instructor notes, scoring criteria, attendance, individual results, remedial assignments, and completion records where relevant and proportionate. A certificate alone does not establish what the officer practiced or learned.

For prior incidents, define similarity by the alleged mechanism. If the claim concerns firing at moving vehicles, identify the vehicle-force issue rather than requesting unrelated force incidents without explanation. Preserve enough scope to test notice and contrary examples.

Officer deposition

Establish the officer's account before supplying a technical reconstruction. Ask what the officer saw, heard, received, believed the person was doing, and did next. Separate contemporaneous knowledge from information learned through later briefings or video review.

Use exact records after obtaining the account. Identify the exhibit, time, visible event, and proposed discrepancy. Ask the officer to explain the difference without assuming that silence, uncertainty, or an imperfect recollection establishes dishonesty.

For each shot or supported phase, cover the perceived threat, target, direction, line of fire, available view, warning, expected result, observed effect, and reason for continuing or stopping. Preserve the distinction between a remembered perception and an inference reconstructed later.

Organizational testimony

Prepare defined subjects concerning policy ownership, training design, records systems, retention, review, notice, corrective action, and implementation. Identify the documents the organization should use to prepare a knowledgeable witness. Counsel should tailor the notice and procedure to the governing rule and local practice.

Do not ask a records custodian to supply a technical opinion outside the custodian's role. Use the custodian to establish systems, handling, completeness, retention, and production. Use the qualified examiner for technical interpretation.

Production gaps and relief

Before seeking relief, identify what remains missing and why it matters. (Rule 37) Record conference efforts and proposed narrowing. (Rule 37) Rule 37 governs specified discovery failures and requires a good-faith conference certification for a motion to compel under Rule 37(a). (Rule 37)

If the missing material is necessary to respond to summary judgment, a Rule 56(d) declaration should identify the particular unavailable facts, why they matter, and why the nonmovant cannot presently supply them. (Rule 56(d)) "Discovery is incomplete" does not explain the missing proof. (Rule 56(d))

SOURCES

1. **Rule 26(b)(1)** https://www.law.cornell.edu/rules/frcp/rule_26
2. **Rule 37** https://www.law.cornell.edu/rules/frcp/rule_37
3. **Rule 56(d)** https://www.law.cornell.edu/rules/frcp/rule_56

CHAPTER 27

Pleading and surviving summary judgment

Plead the supported event, not a string of labels. Identify the shooter, conduct, injured person, legal capacity, governing right, causal injury, and basis for any entity claim. Keep a separate factual basis for each defendant.

Rule 11 requires a reasonable inquiry supporting factual and legal contentions. (Federal Rule of Civil Procedure 11) A specifically identified contention expected to receive evidentiary support after discovery still requires an appropriate prefiling investigation; the rule does not authorize invented facts. (Federal Rule of Civil Procedure 11)

The intended-target claim

Describe the application of force, the purpose and circumstances of restraint, and the facts supporting unreasonableness. Identify the alleged threat and why the available evidence supports the claim despite that asserted threat. Do not rely solely on the word "unarmed."

If later shots present a separate issue, describe the supported change and the officer's opportunity to perceive it. Do not insert an exact interval unless the source and timing method support that precision. Plead medical and physical causation at the level the investigation supports.

Separate the municipal count

Identify the policy or custom, the responsible decision-making structure, the required culpability, and the causal connection. (Monell; Canton) Do not incorporate a long narrative and then assert that the

city failed to train "in all respects." Monell and Canton require more than employment and an injury. (Monell; Canton)

For alternative claims, identify the legal basis and the facts supporting the alternative. (Torres; Lewis; Hawatmeh) A bystander claim may require separate seizure, due-process, and state-law analyses. (Torres; Lewis; Hawatmeh) Do not collapse those standards into one allegation of negligence. (Torres; Lewis; Hawatmeh)

The summary-judgment record

Rule 56 requires particular record support for asserted factual disputes and permits objections when cited material cannot be presented in admissible form. (Rule 56(c)) The response should identify the evidence, exact location, disputed proposition, and legal significance. (Rule 56(c))

Use a four-column response: defense assertion, supported contrary fact, pinpoint record citation, and materiality. Separate a factual dispute from disagreement about the legal consequence of an undisputed fact. Do not ask the court to search an entire video for the relevant moment.

Apply Tolan to disputed facts and Scott to any asserted contradiction by a recording. (Tolan; Scott) Explain the recording's actual limits. (Tolan; Scott) A cropped or obscured view cannot establish the absence of an event beyond the camera's reliable coverage. (Tolan; Scott)

Qualified immunity at the proper date

Address the constitutional issue and clearly established law separately. Use the incident date when identifying precedent relevant to notice. State the material factual comparisons and explain the effect of plaintiff-favorable facts at the procedural stage.

Barnes demonstrates why an appellate procedural victory must not be described as a final merits recovery. (Barnes; Fifth Circuit remand opinion) The Supreme Court corrected the timeframe analysis, but the Fifth Circuit later affirmed judgment for the defendants on remand.

(Barnes; Fifth Circuit remand opinion) Preserve that distinction when discussing the case with clients or in a brief. (Barnes; Fifth Circuit remand opinion)

SOURCES

1. **Federal Rule of Civil Procedure 11** https://www.law.cornell.edu/rules/frcp/rule_11
2. **Monell** https://supreme.justia.com/cases/federal/us/436/658/
3. **Canton** https://supreme.justia.com/cases/federal/us/489/378/
4. **Torres** https://supreme.justia.com/cases/federal/us/592/19-292/
5. **Lewis** https://supreme.justia.com/cases/federal/us/523/833/
6. **Hawatmeh** https://cdn.ca9.uscourts.gov/datastore/opinions/2025/11/07/24-6146.pdf
7. **Rule 56(c)** https://www.law.cornell.edu/rules/frcp/rule_56
8. **Tolan** https://supreme.justia.com/cases/federal/us/572/650/
9. **Scott** https://supreme.justia.com/cases/federal/us/550/372/
10. **Barnes** https://www.supremecourt.gov/opinions/24pdf/23-1239_onjq.pdf
11. **Fifth Circuit remand opinion** https://law.justia.com/cases/federal/appellate-courts/ca5/22-20519/22-20519-2025-09-18.html

CHAPTER 28

Damages, settlement, and the payer

Build damages from the proper claimant's legally recoverable losses. Separate medical costs, future care, earnings, services, pain and suffering, death-related claims, and any other permitted category. Identify the governing authority and supporting records before totaling the demand.

For a surviving injured person, obtain treatment records, functional assessments, employment information, prognosis, and the basis for proposed future care. Use qualified clinicians, life-care planners, and economists where the question requires their expertise. Do not turn a diagnosis into a lifetime cost estimate without a supported care plan and economic method.

Distinguish compensation from punishment

Smith v. Wade permits punitive damages against an individual in a proper Section 1983 case involving evil motive or intent, or reckless or callous indifference to federally protected rights. (Smith v. Wade) Meeting the threshold permits consideration of punitive damages; it does not require an award. (Smith v. Wade, 461 U.S. 30 (1983))

City of Newport v. Fact Concerts bars punitive damages against municipalities under Section 1983. (City of Newport) Do not place a municipal punitive demand into a form complaint merely because punitive relief might be available against an individual. (City of Newport, 453 U.S. 247 (1981))

Section 1988 authorizes specified fee awards in civil-rights enforcement actions, but its separate expert-fee provision is not a general authorization to recover all expert expenses in every Section 1983 case.

(42 U.S.C. § 1988(b) to (c)) Analyze recoverable fees, taxable costs, expert expenses, and contractual obligations separately. (42 U.S.C. § 1988(b) to (c))

A verdict is not a settlement

The Police Brutality Center settlement page includes the Botham Jean award among notable outcomes. (Police Brutality Center; AP) AP reported a $98.65 million federal civil jury verdict against former officer Amber Guyger, not a negotiated settlement. (Police Brutality Center; AP) A verdict amount also does not establish the amount ultimately collected. (Police Brutality Center, shooting settlements; AP, Botham Jean verdict)

Do not use a list of exceptional public outcomes as a valuation schedule. Compare injury, liability evidence, immunity, jurisdiction, payer, available coverage, claim ownership, collection risk, fees, and procedural posture. A reported gross amount can omit allocations, liens, expenses, structured payments, or unresolved enforcement.

Identify the payer

Obtain the relevant insurance, risk-pool, indemnification, reservation, and approval information through appropriate means. (C.R.S. § 13-21-131) Separate an officer's liability from an employer's obligation to indemnify. (C.R.S. § 13-21-131) A statutory indemnification provision can contain conditions and exceptions, as Colorado's Section 13-21-131 does. (C.R.S. § 13-21-131)

Determine who can authorize settlement, whether approvals are required, and which claims and parties the proposed release covers. Review liens, allocation, tax advice, estate or minor approval, confidentiality, public-records obligations, payment timing, and default terms before acceptance.

Evaluate offers with the actual rules

Rule 68 contains a 14-day acceptance period and cost consequences when the offeree's final judgment is not more favorable than an unaccepted offer. (Federal Rule of Civil Procedure 68) Counsel must analyze

the rule, governing fee law, offer wording, and applicable decisions before advising acceptance or rejection. (Federal Rule of Civil Procedure 68) A generic settlement spreadsheet is not enough. (Federal Rule of Civil Procedure 68)

Nonmonetary terms need measurable obligations. If the parties propose training changes, reporting, policy revision, or review procedures, identify the responsible actor, completion date, evidence of implementation, and enforcement mechanism. Do not describe an aspirational promise as completed reform.

SOURCES

1. **Smith v. Wade** https://supreme.justia.com/cases/federal/us/461/30/
2. **City of Newport** https://supreme.justia.com/cases/federal/us/453/247/
3. **42 U.S.C. § 1988(b) to (c)** https://www.law.cornell.edu/uscode/text/42/1988
4. **Police Brutality Center** https://policebrutalitycenter.org/police-shooting-settlements/
5. **AP** https://apnews.com/article/botham-jean-amber-guyger-shooting-dallas-verdict-9212cc71502fb3bc3e1ae90d309ac5a6
6. **C.R.S. § 13-21-131** https://colorado.public.law/statutes/crs_13-21-131
7. **Federal Rule of Civil Procedure 68** https://www.law.cornell.edu/rules/frcp/rule_68

CHAPTER 29

Trial presentation and the evidentiary record

Present the event in an order a person unfamiliar with police tactics can follow. Establish the location, participants, purpose of the encounter, available information, movement, force, and injury. Introduce a technical term when the evidence requires the term, then define it in plain language.

Keep the legal standard, factual evidence, expert opinion, and argument visibly distinct. A juror should not need to infer whether an image is an original frame, processed evidence, a summary, or a proposed reconstruction. Label the exhibit and explain the transformation.

Demonstratives require boundaries

Rule 107 governs illustrative aids used to help the factfinder understand evidence or argument. (Federal Rule of Evidence 107 and advisory note) Such an aid is not itself evidence, and the rule restricts its use during deliberations absent consent or a court order for good cause. (Federal Rule of Evidence 107 and advisory note) A substantive summary under Rule 1006 presents a different evidentiary question. (Federal Rule of Evidence 107 and advisory note)

Prepare an exhibit foundation for each recording, diagram, model, and calculation. Identify the source, custodian or authenticating witness, processing history, intended purpose, and proposed limitations. Counsel should resolve contested uses before the jury encounters an ambiguous animation.

Use a defensible viewpoint

A reconstruction from an overhead view can explain geometry without reproducing the officer's perception. Label the viewpoint. If the display claims to show an officer's view, establish the camera or virtual-camera position, field of view, obstructions, and assumptions.

Do not add an expression, hand movement, sound, or object that the evidence does not support. If a reconstruction compares two possible positions, show the alternatives as alternatives. Keep explanatory colors and labels distinct from actual recorded features.

Prepare the expert for the contrary evidence

Review the strongest opposing reconstruction, uncertainty in the measurement, disputed assumptions, relevant literature, and any changes in opinion. The expert should explain what the method supports without enlarging the conclusion under questioning.

Use ordinary language for limits. "The recording does not resolve the hand position during that interval" is more informative than a broad claim that the video is inconclusive. Identify the specific unresolved fact and its effect on the opinion.

Preserve the legal record

Counsel should prepare claim-specific instructions, verdict questions, objections, offers of proof, and required motions under the applicable rules and scheduling orders. Distinguish a factual issue for the jury from a legal issue for the court. Ensure that the proposed verdict structure does not combine different defendants, standards, or damages categories in a way that obscures the decision.

After an outcome, retain the judgment, orders, settlement documents, approvals, and payment record as applicable. Describe the result using the actual document. An announced agreement, entered judgment, final appellate disposition, and completed payment are different events.

SOURCES

1. **Federal Rule of Evidence 107 and advisory note** https://www.law.cornell.edu/rules/fre/rule_107

PART SIX

Working documents

WORKING DOCUMENT 30

Evidence-to-element worksheet

Use one row for each proposition necessary to a claim, defense, or technical conclusion. Add rows for contrary evidence and missing facts. The worksheet is an investigation tool, not a substitute for counsel's legal analysis or an expert's examination.

Field	Entry
Claim or technical question	Identify the specific issue and defendant.
Governing requirement	State the requirement and its authority, version, jurisdiction, and date.
Proposition to establish	Write a factual proposition, not "the shooting was bad."
Present evidence	Identify item, custodian, exact page, frame, or time.
Evidence classification	Established, disputed, alleged, inferred, or unknown.
Contrary evidence	Identify the strongest supported alternative account.
Missing evidence	State the item and the basis for believing it exists.
Qualified examiner	Identify the discipline needed and assigned scope.
Method	State the proposed examination and limitations.
Causal connection	Explain how the proposition affects the injury or legal element.
Next action	Request, inspection, interview, deposition, or research.
Owner and deadline	Identify the person responsible and verified due date.

Shot-sequence worksheet

Phase or candidate shot	Shooter	Supporting source	Threat description	Observed change	Attribution and timing limits
Enter supported identifier	Name or unresolved	File and pinpoint	Concrete facts	Before and after	State uncertainty

Do not use the row number as proof of shot order. Record whether sequence derives from video, validated timing analysis, physical evidence, testimony, or a combination. Reconcile inconsistencies before

presenting a composite sequence.

Information-receipt worksheet

Information	Original source	Transmitted by	Received by	Supported receipt time	Qualification omitted or changed
Exact message or fact	Call, observation, record	Identified person or system	Identified officer	Source and uncertainty	Exact difference

Keep the original recording and transcript linked. If the record establishes transmission but not receipt, say so. Do not silently convert "available in the system" into "known to the officer."

WORKING DOCUMENT 31

Preservation notice model

Counsel should adapt the following language to the event, recipient, anticipated claims, and actual retention risk. Identify the legal basis for any demand and the appropriate procedure for obtaining an order. The notice does not authorize access or destructive testing.

> To: [agency counsel, records custodian, evidence custodian, vendor, or other appropriate recipient]
>
> Re: Preservation of evidence concerning [person], [incident date], [location], [known incident identifiers]
>
> We represent [client and capacity] concerning the shooting identified above. Litigation concerning [brief, supported description] is reasonably anticipated.
>
> Please preserve relevant evidence within your possession, custody, or control. Identify and suspend routine deletion, overwriting, recycling, disposal, repair, alteration, or return-to-service processes to the extent necessary to preserve that evidence.
>
> The requested preservation includes original body-camera and vehicle-camera recordings; surveillance and device recordings; dispatch and radio audio; computer-aided dispatch event histories and revisions; relevant location records; evidence-platform metadata, audit history, and export records; reports and statements; photographs and scene measurements; firearms, ammunition, magazines, holsters, optics, and associated equipment; recovered projectiles and cartridge cases; relevant clothing, vehicles, and struck materials; and incident-related communications.
>
> Please also preserve the policy and training versions in effect on the incident date, relevant retention rules, device assignments and settings, and records identifying the creation, transfer, access, alteration, or deletion of the listed evidence.

> Preserve native formats and information necessary to interpret the records. An edited presentation copy should not replace the source recording or associated metadata.
>
> Please identify any relevant material already lost, altered, transferred, or scheduled for disposition, including the date, responsible custodian, process, and available recovery or replacement source.
>
> We request confirmation of receipt and identification of the person coordinating preservation. Please advise promptly of any disputed scope, technical impediment, or imminent risk so that counsel can address the issue through an agreed protocol or appropriate judicial process.
>
> This letter requests preservation. It does not propose unilateral access, examination, alteration, or destructive testing.
>
> [Counsel name, signature, contact information, and date]

Maintain a recipient log with the delivered version, delivery evidence, acknowledgment, custodian, unresolved issue, and follow-up date. Tailor a separate notice to a private camera owner or medical custodian rather than sending every recipient an indiscriminate agency-wide demand.

WORKING DOCUMENT 32

Client preservation instructions

Give the client instructions the client can carry out without changing evidence. Discuss questions before the client replaces a device, closes an account, cleans clothing, repairs property, or shares an original item.

> Preserve original photographs, recordings, messages, emails, social-media material, documents, devices, clothing, and other items concerning the incident, injuries, treatment, and claimed losses.
>
> Do not delete, edit, crop, annotate, overwrite, repair, discard, or clean potential evidence. Do not change account retention settings without discussing preservation with counsel.
>
> Tell counsel which devices, accounts, cameras, and storage services may contain relevant material. Retain original files rather than screenshots alone.
>
> Record the names and contact information of potential witnesses. Do not ask witnesses to agree on an account or rehearse a common statement.
>
> Preserve bills, employment records, receipts, treatment instructions, and communications about physical limitations. Keep a factual record of symptoms and activities without guessing at a medical cause.
>
> Contact counsel before transferring original physical evidence. Use the agreed transfer method and document the person receiving each item.
>
> Notify counsel immediately if a device fails, an account becomes inaccessible, material disappears, or another person requests evidence.

Explain the instructions in the client's preferred language and confirm understanding. Adapt the process for disability, grief, limited technology access, and the client's ability to retain records securely.

WORKING DOCUMENT 33

Discovery request modules

These modules identify subjects for counsel to convert into requests that satisfy the governing rules, definitions, scope, and local practice. (Rule 26(b)(1)) The requests should address nonprivileged material relevant and proportional to the claims and defenses. (Rule 26(b)(1))

Recordings and timing

> Produce the native recordings identified in [defined incident scope], including associated metadata, original filenames, device identifiers, relevant time settings, audit history, export history, and proprietary playback information necessary to interpret the recordings.
>
> Identify gaps, interrupted recordings, redactions, unavailable originals, known time discrepancies, and processing applied to any produced copy. Produce the records supporting that identification.
>
> Identify the custodian, retention policy, preservation action, and disposition history for each requested recording not produced.

Dispatch and communications

> Produce the original emergency calls, dispatch audio, relevant radio channels, event entries, revisions, transmission records, and available records showing receipt or acknowledgment of information concerning the incident.
>
> Produce incident-related instructions, briefings, messages, and supervisory communications within [defined custodians and period].

Physical evidence

> Identify the firearms, ammunition, magazines, holsters, optics, lights, less-lethal devices, projectiles, cartridge cases, clothing, vehicles, and struck materials collected or examined in connection with the incident.
>
> Produce the collection, transfer, storage, examination, repair, cleaning, testing, and disposition records for those items, together with photographs, measurements, reports, raw test data, and relevant laboratory notes.
>
> Identify proposed testing or disposition that could alter an item before the parties can address an inspection protocol.

Policy, training, and supervision

> Produce the operative policy and training materials addressing [specified disputed conduct], including effective dates, revisions, distribution, acknowledgment, actual instruction, evaluation criteria, individual results, and relevant remediation.
>
> Produce records identifying the authority and responsibilities of persons who adopted, implemented, supervised, or reviewed the identified practice.

Prior incidents and notice

> For [defined period and factual mechanism], produce records sufficient to identify relevant incidents, complaints, findings, notice to decisionmakers, recommended corrective measures, decisions, and implementation.
>
> Identify the systems searched, search limitations, and records supporting any assertion that no responsive incidents exist.

Medical response

> Produce records showing injury recognition, requests for medical assistance, scene-access decisions, available medical equipment, interventions, personnel qualifications where relevant, treatment times, and transfer of care.
>
> Identify the factual basis for any claimed safety condition that delayed access or treatment.

Review the responses against the original proposition matrix. A large production does not establish completeness. Record the missing custodian, date range, format, attachment, or audit field with enough precision to permit correction.

SOURCES

1. **Rule 26(b)(1)** https://www.law.cornell.edu/rules/frcp/rule_26

WORKING DOCUMENT 34

Deposition question sets

Use these questions to obtain an account and test the record, not to supply the desired answer. Counsel should adapt wording, sequence, exhibits, and privilege issues to the witness and governing practice.

Responding officer

- **Assignment:** What information did you receive before arrival, from whom, and through which channel?
- **Observation:** Describe the person's location, hands, object, movement, and distance when you first observed the person.
- **View:** Identify obstructions, lighting, your position, and changes in your view.
- **Commands:** State the words you used, the intended recipient, and the response you observed.
- **Threat:** Describe the specific act you understood as threatening death or serious injury.
- **Timing:** What occurred between that observation and the first shot?
- **Direction:** Describe the target, intervening objects, nearby people, and backdrop you perceived.
- **Continuation:** What did you observe after the first shot, and what caused you to continue or stop?
- **Knowledge:** Which details in your present account did you learn after the shooting?
- **Review:** Which recordings, reports, or conversations did you review before preparing each statement?
- **Aid:** What injury did you observe, what assistance did you request or provide, and what prevented any additional action?

Dispatcher or communications supervisor

- **Original information:** Identify the caller's exact description and qualifications.
- **Classification:** Explain the event classification and any changes.
- **Transmission:** Identify what was transmitted, omitted, condensed, or revised and why.
- **Receipt:** Identify what the records establish about officer receipt or acknowledgment.
- **System:** Explain the relevant time settings, retention, edits, and audit history.
- **Training:** Identify instruction and evaluation concerning the disputed information-handling task.

Training or policy witness

- **Requirement:** Identify the operative requirement and its effective date.
- **Delivery:** Describe what instructors actually taught and how instruction was documented.
- **Evaluation:** Identify the performance criteria and the involved officer's results.
- **Remediation:** Explain any relevant failure, corrective assignment, and completion.
- **Notice:** Identify prior events that raised the same issue and who received the information.
- **Response:** Describe the decision, implementation, and verification of any correction.
- **Causation:** Identify records showing whether the disputed practice influenced the incident.

Records or vendor witness

- **Creation:** Explain how the system creates and identifies a recording.
- **Completeness:** Identify start, stop, buffer, interruption, and upload behavior relevant to the device.

- **Timing:** Explain clock settings, synchronization, known drift, and associated records.
- **Processing:** Identify exports, transcoding, redaction, replacement, or deletion.
- **Custody:** Identify access, transfer, retention, and recovery history.
- **Production:** Explain the search, exclusions, unavailable fields, and basis for claiming completeness.

Use a final open request for corrections or omitted information. Preserve the witness's explanation alongside the exhibit rather than reducing the testimony to a favorable excerpt.

WORKING DOCUMENT 35

Expert assignment and inspection protocol

Define the question in terms the retained specialist can answer. “Prove the shooting was unjustified” is not an appropriate technical assignment. A defined assignment identifies the evidence, method, scope, and limits without prescribing the result.

Assignment: Examine [specified technical issue] concerning [incident].

Materials: Review the supplied evidence register and identify missing originals, relevant additional records, and conditions that limit analysis.

Questions: Determine [specific measurements, mechanisms, operational comparisons, or medically supported causal questions] within your qualifications.

Methods: Identify the proposed methods, validation or accepted basis, case-specific application, assumptions, and uncertainty.

Alternatives: Examine materially supported competing explanations, including evidence inconsistent with the retaining party’s position.

Testing: Do not conduct destructive testing or materially alter physical evidence without the agreed protocol or appropriate authorization.

Reporting: Separate observations, measurements, assumptions, inferences, opinions, and unresolved questions. Identify the basis and limits of each conclusion.

Changes: Notify counsel when additional evidence materially affects an opinion or the required scope.

Compensation: Compensation is for time and work, not a favorable result.

Inspection protocol fields

Identify the participants, authority for access, date, location, items, condition documentation, tools, calibration or verification, sequence, observers, recording, safety controls, prohibited alterations, stop conditions, and preservation of remnants. Define how the parties will address a proposed change.

For video, specify acquisition, integrity verification, playback tools, timebase examination, processing documentation, and output labeling. For firearms and materials, specify qualified handling, non-destructive examination before altered conditions, and the approval process for further tests.

At completion, reconcile the items and condition record. Preserve raw measurements, logs, photographs, settings, unsuccessful tests, and deviations. The final report should permit another qualified examiner to understand what occurred.

WORKING DOCUMENT 36

Pleading and motion components

The components below are proposed structures, not filing-ready papers. (Rule 11) Counsel must supply supported facts, proper parties, jurisdiction, venue, capacity, current authority, local formatting, signature, and service requirements. (Rule 11) Rule 11 governs the factual and legal inquiry. (Rule 11)

Individual force claim

> On [date], Officer [name], acting under color of [identified state authority], intentionally applied firearm force to [person] under the circumstances described in paragraphs [range].
>
> The evidence presently supporting the claim includes [specific records or witness basis]. Those materials support the following facts concerning the asserted threat: [concrete facts about conduct, object, direction, distance, barriers, warnings, and timing].
>
> The challenged force was objectively unreasonable under [applicable authority] because [application to supported facts, including relevant contrary circumstances].
>
> The force caused [identified injury and supported causal connection].
>
> [If appropriate to the forum and posture, identify the incident-date authority and factual comparison relevant to qualified immunity.]

Municipal claim

> Before the incident, [proper entity] maintained [identified policy or supported custom] through [relevant decision-making authority].

> [Describe the factual basis for the policy or custom, the required culpability, and relevant notice. Distinguish established records from specifically identified allegations requiring discovery.]
>
> The policy or custom caused the constitutional injury through [specific mechanism connecting the policy to the conduct and injury].
>
> The claim does not rest solely on the entity's employment of the officer.

Alternative unintended-victim claim

> The force objectively manifested [supported purpose and conduct]. Plaintiff alleges a seizure under [controlling authority] because [facts satisfying that authority].
>
> Alternatively, if the court determines that no seizure occurred, Plaintiff alleges [properly supported alternative claim] under [applicable standard], based on [facts satisfying the required culpability and causation].
>
> Plaintiff separately asserts [supported state claim] subject to [verified notice, immunity, privilege, capacity, and limitations analysis].

Do not insert every alternative merely because the form contains a place for one. (Torres; Lewis; Kilnapp; Hawatmeh) The circuit-specific seizure analysis and context-dependent due-process standard require actual legal research. (Torres; Lewis; Kilnapp; Hawatmeh)

Summary-judgment opposition

> The motion depends on disputed facts material to [identified element].
>
> Defendant asserts [proposition]. The record supports [contrary proposition] at [precise exhibit, page, line, file, and interval]. The dispute matters because [legal significance].
>
> On the properly supported plaintiff-favorable facts, [apply the governing standard]. The clearly-established-law analysis concerns the law existing on [incident date], including [authority and material comparison].
>
> Plaintiff requests [specific relief by claim or issue].

Rule 56(d) declaration

> I am [name and role] and have personal knowledge of the procedural facts stated here.
>
> The motion asserts [material proposition]. Evidence essential to respond consists of [specific records, testimony, or inspection].
>
> The evidence is expected to address [material fact] because [non-speculative basis].
>
> Plaintiff requested the evidence on [date] through [method]. The present status is [specific response, omission, objection, or scheduled event].
>
> Plaintiff cannot presently supply the evidence because [specific reason]. Plaintiff has pursued the evidence by [documented steps].
>
> The proposed discovery is [defined scope], with completion proposed by [supported date].
>
> Plaintiff requests [authorized relief under Rule 56(d)].
>
> [Proper declaration language, signature, and date.]

Rule 56(d) requires an affidavit or declaration stating specified reasons the nonmovant cannot present essential facts. (Rule 56(d)) Tailor the request to those facts and the actual procedural record. (Rule 56(d))

SOURCES

1. **Rule 11** https://www.law.cornell.edu/rules/frcp/rule_11
2. **Torres** https://supreme.justia.com/cases/federal/us/592/19-292/
3. **Lewis** https://supreme.justia.com/cases/federal/us/523/833/
4. **Kilnapp** https://www.supremecourt.gov/DocketPDF/25/25A1123/404053/20260409151330331_Kilnapp%20Cert%20Petition%20Extension%20Request%20App%20A.pdf
5. **Hawatmeh** https://cdn.ca9.uscourts.gov/datastore/opinions/2025/11/07/24-6146.pdf
6. **Rule 56(d)** https://www.law.cornell.edu/rules/frcp/rule_56

WORKING DOCUMENT 37

Final file review

Review the file by claim, defendant, and proposed opinion. A general sense that the event was preventable does not establish the required legal or technical propositions.

Before filing

- **Client and capacity:** Confirm the claimant, authority, estate or minor representation, beneficiaries, and conflicts.
- **Calendar:** Verify accrual, limitations, notices, presentment, service, and the basis for any tolling position.
- **Defendants:** Confirm identity, employer, authority, legal capacity, and personal conduct.
- **Claims:** Separate constitutional force, state tort, municipal policy, federal remedy, and medical-care theories.
- **Facts:** Identify support, contrary evidence, uncertainty, and allegations requiring further discovery.
- **Authority:** Verify jurisdiction, incident-date law, subsequent history, and the actual holding.
- **Relief:** Confirm permitted damages, proper recipient, fees, costs, and any basis for prospective relief.

Before expert disclosure

- **Evidence:** Identify originals, acquisition history, missing items, and material limitations.
- **Qualifications:** Match each opinion to the witness's relevant expertise.
- **Methods:** Document the method, fit, application, uncertainty, and reproducibility.

- **Assumptions:** Identify disputed assumptions and test their effect.
- **Alternatives:** Address material competing explanations and adverse evidence.
- **Scope:** Remove unsupported legal conclusions, credibility decisions, and opinions outside the assignment.
- **Disclosure:** Meet the report, timing, and supplementation requirements. (Rule 26)

Before mediation or trial

- **Liability:** State the strongest supported claim and strongest defense without caricature.
- **Causation:** Separate discharge, projectile, wound, later medical harm, and legal causation.
- **Damages:** Verify claim ownership, supporting records, calculations, and duplication.
- **Payer:** Confirm authority, coverage, indemnification, collection issues, and approvals.
- **Exhibits:** Verify originals, transformations, foundations, labels, and intended use.
- **Record:** Prepare the required objections, instructions, verdict questions, and procedural motions.

Keep the last reviewed version of the evidence register, authority chart, damages calculation, and exhibit list in the trial file. Identify the responsible person and review date on each document.

SOURCES

1. **Rule 26** https://www.law.cornell.edu/rules/frcp/rule_26

WORKING DOCUMENT 38

Case records and the questions they support

Use the actual decision or record to identify the question the matter can illuminate. A reported outcome does not establish that another case with one similar feature should produce the same result. Preserve the source's facts, posture, holding, and limits.

Edward Garner: arrest authority and force

Hymon responded to a suspected burglary, saw Garner near a fence, and was reasonably sure Garner was unarmed. Hymon shot when Garner began to climb. (Garner, 3 to 5) The Supreme Court rejected the state rule insofar as the rule authorized deadly force against an apparently unarmed, nondangerous fleeing suspect. (Garner, 11 to 12, 20 to 22)

The useful comparison concerns the supported danger, not flight alone. (Garner) In another fleeing-person case, identify the information supporting probable cause to believe the person posed the required serious threat, the necessity of preventing escape, and warning feasibility. (Garner) Do not substitute "suspected felon" for those facts. (Garner, 11 to 12)

Walter Scott: identify the authoritative account

DOJ's sentencing release states that Michael Slager stopped Walter Scott for a faulty brake light, pursued Scott on foot, and deployed a Taser. (DOJ, Slager sentencing) The release states that Scott was unarmed and running away when Slager fired eight shots, five of which struck Scott from behind. (DOJ, Slager sentencing) Slager pleaded guilty to a federal civil-rights offense in May 2017, and the court imposed a 20-year sentence on December 7, 2017. (DOJ, Slager sentencing)

Those statements are attributed to the dated DOJ record. They do not represent a new forensic examination or a complete subsequent-history review. For another case involving flight, obtain the original recordings, statements, physical evidence, and applicable law rather than treating the Scott account as a substitute for the new record.

Tamir Rice: information loss and incomplete imagery

DOJ identified qualifications in the emergency call that did not reach responding officers and limitations in the available surveillance recording. (DOJ, Rice investigation) Prosecutors concluded that the available evidence did not establish the required federal criminal violation beyond a reasonable doubt. (DOJ, Rice investigation)

Investigate the original call, dispatcher's handling, radio transmission, officer receipt, approach, and actual camera coverage as separate subjects. Do not infer that a criminal declination resolved every operational question. Do not claim that a low-frame-rate recording establishes a movement the recording did not capture.

Robbie Tolan: disputed facts at summary judgment

The Supreme Court identified disputed lighting, demeanor, words, and movement that the lower court had not treated properly in resolving qualified immunity at summary judgment. (Tolan, 656 to 659) The Court vacated and remanded without deciding whether the officer violated clearly established law. (Tolan, 659 to 660)

Build the response from exact record citations. Explain why the dispute changes the legal analysis. A remand requiring proper treatment of evidence is not itself a jury verdict establishing excessive force.

Ashtian Barnes: a changed rule and a later defense judgment

The Supreme Court rejected a timeframe rule that excluded relevant events before the immediate perceived threat. (Barnes) On remand, the Fifth Circuit considered the broader circumstances and again affirmed judgment for the defendants. (Fifth Circuit remand opinion) The later Supreme Court petition was denied on April 27, 2026. (Docket 25-1005)

Preserve the full sequence when analyzing force, then apply the standard to the actual record. The procedural history demonstrates why a favorable doctrinal ruling and a favorable final liability outcome must remain separate descriptions.

Joseph Hawatmeh and Jennifer Kilnapp: purpose, seizure, and jurisdiction

Hawatmeh involved a child held by a hostage taker and officers attempting a rescue. (Hawatmeh) The Ninth Circuit rejected the seizure theory on the circumstances before the court and also addressed immunity and the father's due-process claim. (Hawatmeh)

Kilnapp involved an officer struck by another officer's intentional gunfire during an encounter with a reported armed suspect. (Kilnapp) The Sixth Circuit found a seizure under its analysis but granted the shooter immunity because the rule was not clearly established at the incident date. (Kilnapp)

The distinction requires more than the word "bystander." Investigate the purpose objectively manifested by the force, the situation of the injured person, the incident date, and the governing circuit. Keep state tort analysis separate from the constitutional remedy question.

Botham Jean: the form of the outcome

AP reported a $98.65 million jury verdict against former officer Amber Guyger after a federal civil trial concerning Botham Jean's death. (AP, Jean verdict) The reported event was a verdict, not a settlement or a verified collection. (AP, Jean verdict)

Use the correct outcome label in a demand, publication, or client discussion. Obtain the judgment, later orders, settlement instrument if any, and payment evidence before claiming a final collectible recovery.

SOURCES

1. **Garner, 3 to 5** https://supreme.justia.com/cases/federal/us/471/1/
2. **DOJ, Slager sentencing** https://www.justice.gov/archives/opa/pr/former-north-charleston-south-carolina-police-officer-michael-slager-sentenced-20-years

3. **DOJ, Rice investigation** https://www.justice.gov/archives/opa/pr/justice-department-announces-closing-investigation-2014-officer-involved-shooting-cleveland
4. **Tolan, 656 to 659** https://supreme.justia.com/cases/federal/us/572/650/
5. **Barnes** https://www.supremecourt.gov/opinions/24pdf/23-1239_onjq.pdf
6. **Fifth Circuit remand opinion** https://law.justia.com/cases/federal/appellate-courts/ca5/22-20519/22-20519-2025-09-18.html
7. **Docket 25-1005** https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/25-1005.html
8. **Hawatmeh** https://cdn.ca9.uscourts.gov/datastore/opinions/2025/11/07/24-6146.pdf
9. **Kilnapp** https://www.supremecourt.gov/DocketPDF/25/25A1123/404053/20260409151330331_Kilnapp%20Cert%20Petition%20Extension%20Request%20App%20A.pdf
10. **AP, Jean verdict** https://apnews.com/article/botham-jean-amber-guyger-shooting-dallas-verdict-9212cc71502fb3bc3e1ae90d309ac5a6

WORKING DOCUMENT 39

Defined terms

Use a term only after identifying the actual legal or technical proposition. The definitions below provide reading aids; the cited authority and case-specific application remain necessary.

Term	Meaning in the analysis
Accrual	The point at which a claim becomes complete and present under the applicable rule. Federal law governs Section 1983 accrual, while the limitations period generally comes from state personal-injury law. (Wallace)
Administrative presentment	Delivery of the required claim to the appropriate federal agency before a covered FTCA suit, including the required sum certain and representative authority. (28 C.F.R. § 14.2)
Allegation	A party's assertion, not a finding established merely by inclusion in a complaint. (Rule 11)
Custom	A municipal practice that can support liability when it satisfies Monell and causes the constitutional injury, even without formal adoption. (Monell)
Deliberate indifference	The demanding culpability requirement applicable to specified claims; its content must come from the governing context rather than a general accusation of carelessness. (Canton; Lewis)
Demonstrative or illustrative aid	A presentation used to help explain evidence or argument; an illustrative aid under Rule 107 is not itself evidence. (Rule 107)
Native recording	The recording in its original system or device format, with the structural information needed for the proposed examination. (SWGDE)
Qualified immunity	The individual-official defense requiring analysis of constitutional violation and clearly established law under the applicable doctrine. (Zorn)
Respondeat superior	Liability based on an employment relationship; Monell rejects that basis alone for municipal Section 1983 liability. (Monell)
Seizure by force	Physical force applied with objectively manifested intent to restrain, subject to the governing authority and factual setting. (Torres)
Spoliation issue	A dispute about lost or altered evidence; Rule 37(e) supplies specific requirements for the loss of covered electronically stored information. (Rule 37(e))
Sum certain	A specified monetary demand required for covered FTCA administrative presentment. (28 C.F.R. § 14.2)
Summary judgment	A procedure requiring examination of whether a genuine dispute of material fact exists and whether the movant is entitled to judgment as a matter of law. (Rule 56)

Term	Meaning in the analysis
Transcoding	Conversion of a media file into another encoding or format, which can limit later analysis of original timing or structure. (SWGDE)

SOURCES

1. **Wallace** https://supreme.justia.com/cases/federal/us/549/384/
2. **28 C.F.R. § 14.2** https://www.law.cornell.edu/cfr/text/28/14.2
3. **Rule 11** https://www.law.cornell.edu/rules/frcp/rule_11
4. **Monell** https://supreme.justia.com/cases/federal/us/436/658/
5. **Canton** https://supreme.justia.com/cases/federal/us/489/378/
6. **Lewis** https://supreme.justia.com/cases/federal/us/523/833/
7. **Rule 107** https://www.law.cornell.edu/rules/fre/rule_107
8. **SWGDE** https://www.swgde.org/wp-content/uploads/2025/03/2023-03-03-Best-Practices-for-Digital-Forensic-Video-Analysis-18-V-001-2.1.pdf
9. **Zorn** https://www.supremecourt.gov/opinions/25pdf/25-297_bqm2.pdf
10. **Torres** https://supreme.justia.com/cases/federal/us/592/19-292/
11. **Rule 37(e)** https://www.law.cornell.edu/rules/frcp/rule_37
12. **Rule 56** https://www.law.cornell.edu/rules/frcp/rule_56
13. **SWGDE** https://www.swgde.org/documents/published-complete-listing/19-v-005-swgde-best-practice-for-frame-timing-analysis-of-video-stored-in-iso-base-media-file-formats/

WORKING DOCUMENT 40

Source corrections and research limits

The supplied Police Brutality Center pages identify useful subjects for investigation, including civil remedies, wrongful death, evidence collection, and family losses. (Police Brutality Center) Their attorney-advertising summaries are secondary orientation material, not substitutes for statutes, judicial opinions, or original records. (Police Brutality Center) The site expressly identifies its content as attorney advertising and general information. (Police Brutality Center)

Corrections applied

Source proposition	Required distinction
Qualified immunity protects officers and departments	Individual immunity and municipal liability differ. Municipalities do not receive the officer's good-faith immunity, but Monell still requires policy or custom and causation. (Owen; Monell)
An agency is vicariously liable for its officer's constitutional wrong	Section 1983 municipal liability is not respondeat superior. State employer liability requires separate analysis. (Monell)
Few criminal arrests means almost all shootings were legally justified	Arrest data and civil justification findings measure different outcomes; DOJ's Rice decision illustrates the specific criminal proof inquiry. (BGSU; DOJ)
Botham Jean's nearly $100 million outcome was a settlement	AP reported a $98.65 million jury verdict against Amber Guyger. (AP)
A published settlement range values another case	Selected reported outcomes do not supply a complete, comparable valuation dataset. (PBC settlement page)
The Washington Post database is a current ongoing count	Its event coverage ends December 31, 2024. (Fatal Force)
All bystander injuries fall outside the Fourth Amendment	Current circuit decisions require analysis of intent, purpose, context, incident date, and jurisdiction. (Kilnapp; Hawatmeh)
Barnes established that the shooting was unlawful	The Supreme Court corrected the timeframe rule; the Fifth Circuit later affirmed judgment for defendants, and the later petition was denied. (Barnes; Remand; Docket)
A system failure automatically establishes municipal liability	Operational prevention and legal liability require different findings. (Doyle; Canton; Connick)

Status and coverage

Named cases are used for their verified opinions or specifically attributed historical records. (DOJ; DOJ; AP) A decision's description of disputed facts retains its procedural context. (DOJ; DOJ; AP) The dated Walter Scott sentencing account, Tamir Rice charging decision, and Botham Jean verdict report do not purport to establish every later proceeding or the amount of money collected. (DOJ, Slager sentencing; DOJ, Rice investigation; AP, Jean verdict)

The research checked the later Supreme Court dockets identified in the Barnes and Kilnapp discussions. Other authority still requires a current citator and jurisdiction-specific review before filing. No independent forensic examination of those incidents is represented.

The original Wolf reference sites supplied the subject structure for firearm handling, force, bystanders, expert work, preservation, and sniper investigation. (Wolf; Wolf) The present treatment reorganizes those subjects and does not reproduce every case profile, marketing statement, or unsupported generalization in the earlier sites. (Wolf, police-shooting guide; Wolf, firearm-handling guide)

Use the source attached to the proposition, not a quotation detached from its qualification. Preserve the opinion, statutory version, dataset snapshot, policy, or technical document used in the actual case file.

SOURCES

1. **Police Brutality Center** https://policebrutalitycenter.org/
2. **Owen** https://www.law.cornell.edu/supremecourt/text/445/622
3. **Monell** https://supreme.justia.com/cases/federal/us/436/658/
4. **BGSU** https://www.bgsu.edu/health-and-human-services/programs/department-of-human-services/criminal-justice/police-integrity-lost/
5. **DOJ** https://www.justice.gov/archives/opa/pr/justice-department-announces-closing-investigation-2014-officer-involved-shooting-cleveland
6. **AP** https://apnews.com/article/botham-jean-amber-guyger-shooting-dallas-verdict-9212cc71502fb3bc3e1ae90d309ac5a6
7. **PBC settlement page** https://policebrutalitycenter.org/police-shooting-settlements/
8. **Fatal Force** https://www.washingtonpost.com/graphics/investigations/police-shootings-database/
9. **Kilnapp** https://www.supremecourt.gov/DocketPDF/25/25A1123/404053/20260409151330331_Kilnapp%20Cert%20Petition%20Extension%20Request%20App%20A.pdf
10. **Hawatmeh** https://cdn.ca9.uscourts.gov/datastore/opinions/2025/11/07/24-6146.pdf
11. **Barnes** https://www.supremecourt.gov/opinions/24pdf/23-1239_onjq.pdf
12. **Remand** https://law.justia.com/cases/federal/appellate-courts/ca5/22-20519/22-20519-2025-09-18.html
13. **Docket** https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/25-1005.html

14. **Doyle** https://commonwealthbeacon.org/criminal-justice/every-police-bad-shoot-should-be-treated-as-a-system-failure/
15. **Canton** https://supreme.justia.com/cases/federal/us/489/378/
16. **Connick** https://supreme.justia.com/cases/federal/us/563/51/
17. **DOJ** https://www.justice.gov/archives/opa/pr/former-north-charleston-south-carolina-police-officer-michael-slager-sentenced-20-years
18. **Wolf** https://police-shootings.netlify.app/
19. **Wolf** https://firearms-handling-use-of-force-cases.netlify.app/

PART SEVEN

Case and counsel directory

CHAPTER 41

Using the case and counsel directory

The directory identifies shooting matters and the attorneys found in the reviewed public records. A single shooting involving several victims counts as one matter. The selection includes historical cases and recently reported filings, not an exhaustive inventory of police shootings or litigation nationwide.

An incident title identifies a shooting for research. It is not a court caption. A shortened caption appears only where the reviewed material identifies a formal proceeding; the linked record supplies the full parties and procedural context. The Rekia Boyd entry identifies an international petition, not a United States district-court action.

Counsel names identify representation reported in the linked material. The representation can concern different relatives, an estate, a survivor, or a related proceeding. The list does not establish that every lawyer represented every claimant or participated in every stage.

Firm names appear only where a reviewed case record or professional profile identifies the affiliation. A separately linked profile can identify a later firm, not the firm that handled the historical case. No firm name appears when the affiliation remains uncertain. Historical counsel are identified as historical where the review established that distinction.

Inclusion does not establish that a shooting was unjustified, that a claim succeeded, or that an attorney has an open expert assignment. An allegation remains an allegation unless the cited adjudication establishes otherwise. The investigation prompts identify questions to examine, not findings about the incident. These names do not imply an endorsement, a referral arrangement, or the author's participation in any listed case.

CHAPTER 42

Civil-rights counsel by state

The locations below follow attorney biographies, firm pages, and professional directories. A listed office does not establish an attorney's only office, current case assignment, or availability to retain an expert. The case links document reported representation; the location links document the separate geographic connection.

State	Attorney	Documented practice location	Illustrative shooting matters
Arizona	Daniel Ortega	Phoenix	Antonio Arce
California	John Burris	Oakland	Oscar Grant; Alan Blueford
Florida	Ben Crump	Tallahassee (2023 report)	Breonna Taylor; Stephon Clark
Georgia	L. Chris Stewart	Atlanta	Walter Scott; Rayshard Brooks
Illinois	Antonio Romanucci	Chicago	Botham Jean; Daunte Wright
Kentucky	Lonita Baker	Louisville	Breonna Taylor
Louisiana	Mary Howell	New Orleans	Ronald Madison and James Brissette
Maryland	Andrew Levy	Baltimore	Alexander LaMorie
Michigan	Cynthia Heenan	Detroit	Milton Hall
Minnesota	Jeff Storms	Minneapolis	Daunte Wright; Amir Locke
Missouri	Javad M. Khazaeli	St. Louis	Mansur Ball-Bey
New York	Randolph M. McLaughlin	New York	Mohamed Bah
North Carolina	Charles Monnett	Charlotte	Jonathan Ferrell
Ohio	Subodh Chandra	Cleveland	Tamir Rice
Oklahoma	Damario Solomon-Simmons	Tulsa	Terence Crutcher
Oregon	Jesse Merrithew	Portland	Maverick Winston Lyon

State	Attorney	Documented practice location	Illustrative shooting matters
Pennsylvania	Lee Merritt	Philadelphia	Sean Monterrosa; Diante Yarber
Pennsylvania	Shaka Johnson	Philadelphia	Eddie Irizarry
South Carolina	Justin Bamberg	Bamberg	Keith Lamont Scott; Alton Sterling
Tennessee	André C. Wharton	Memphis	Tyrin Johnson
Texas	Daryl Washington	Dallas	Diante Yarber; Botham Jean
Utah	Karra Porter	Salt Lake City	Darrien Hunt
Washington	Alicia LeDuc Montgomery	Seattle	Maverick Winston Lyon

The selection includes nationally visible lawyers and regional civil-rights litigators. It is not a ranking, a complete inventory of counsel, or a claim that every listed attorney limits the practice to civil-rights work. Confirm current practice information before sending a case-specific inquiry.

SOURCES

1. **Arizona** https://www.ortegalaw.com/ortega-team
2. **Antonio Arce** https://www.phoenixnewtimes.com/news/antonio-arces-family-wanted-answers-tempe-demanded-secrecy-11367171
3. **California** https://www.martindale.com/attorney/john-l-burris-172933/
4. **Oscar Grant** https://www.nbcbayarea.com/news/local/san-francisco-federal-appeals-court-clears-ways-for/2071731/
5. **Alan Blueford** https://oaklandnorth.net/2012/10/08/blueford-family-attorneys-still-have-questions-after-release-of-police-documents/
6. **Florida** https://www.floridabar.org/the-florida-bar-news/st-thomas-college-of-law-named-after-ben-crump/
7. **Breonna Taylor** https://bencrump.com/civil-rights-lawyer/breonna-taylors-lawyer/
8. **Stephon Clark** https://www.panish.law/2019/01/family-of-stephon-clark-files-wrongful-death-lawsuit-against-sacramento-officers-city-for-fatal-shooting/
9. **Georgia** https://profiles.superlawyers.com/georgia/atlanta/lawyer/l-chris-stewart/091be37b-fa01-49db-b757-7db294b36ede.html
10. **Walter Scott** https://provenverdicts.com/stewart-miller-simmons-trial-attorneys/proven-verdicts/walter-scott-north-charleston-6-5-million-settlement
11. **Rayshard Brooks** https://www.ajc.com/news/atlanta-news/atlanta-lawyers-seek-civil-trial-against-officers-that-killed-rayshard-brooks/JLU6ODYWZBBX7LGUVHNY2RI2IA/
12. **Illinois** https://www.rblaw.net/professionals-antonio-romanucci
13. **Botham Jean** https://bencrump.com/press/family-of-botham-jean-and-their-legal-team-react-to-98-65-million-settlement-verdict/
14. **Daunte Wright** https://www.mprnews.org/story/2022/06/22/attorneys-daunte-wright-family-has-a-325m-settlement-agreement-with-city-of-brooklyn-center
15. **Kentucky** https://www.bakerwestbrook.com/lonita-baker
16. **Louisiana** https://www.martindale.com/attorney/ms-mary-e-howell-603129/

17. **Ronald Madison and James Brissette** https://www.nola.com/news/ending-decade-long-danziger-bridge-case-federal-judge-accepts-guilty-pleas-from-5-ex-nopd/article_60f6b8ad-a238-573c-a9eb-7b27aa40b21b.html
18. **Maryland** https://browngold.com/people/andy-levy/
19. **Alexander LaMorie** https://browngold.com/news/the-family-of-25-year-old-person-with-autism-killed-by-howard-county-police-represented-by-bgl-have-filed-an-ada-rehabilitation-act-lawsuit/
20. **Michigan** https://lawyers.findlaw.com/michigan/detroit/1343100_1/
21. **Milton Hall** https://milawyersweekly.com/news/2014/08/05/mentally-disturbed-man-shot-by-police/
22. **Minnesota** https://www.stormsdworak.com/attorneys/
23. **Amir Locke** https://bencrump.com/press/court-denies-minneapolis-attempt-to-dismiss-amir-locke-civil-rights-lawsuit/
24. **Missouri** https://kwlawstl.com/immigration-lawyer-in-st-louis/
25. **Mansur Ball-Bey** https://molawyersmedia.com/2025/03/13/police-shooting-lawsuit-st-louis-18m-verdict/
26. **New York** https://www.nfllp.com/attorney-profiles/randolph-m-mclaughlin/
27. **Mohamed Bah** https://www.courtlistener.com/opinion/7330973/bah-v-city-of-ny/
28. **North Carolina** https://www.carolinalaw.com/team/charles-monnett/
29. **Jonathan Ferrell** https://www.charlotteobserver.com/news/local/crime/article20983929.html
30. **Ohio** https://www.chandralaw.com/about/meet-the-team/subodh-chandra
31. **Tamir Rice** https://whistleblower.org/in-the-news/the-washington-post-justice-dept-quietly-curtailed-civil-rights-investigation-into-tamir-rice-killing/
32. **Oklahoma** https://www.solomonsimmonslaw.com/
33. **Terence Crutcher** https://www.law360.com/articles/2460151
34. **Oregon** https://www.lmhlegal.com/about-lmh
35. **Maverick Winston Lyon** https://www.stritmatter.com/albany-police-sued-for-shooting-hostage-five-times-after-he-escaped-captor/
36. **Pennsylvania** https://profiles.superlawyers.com/pennsylvania/philadelphia/lawyer/s-lee-merritt/d6e61ddd-deb1-4ff3-b0fa-aad002fb7102.html
37. **Sean Monterrosa** https://mceldrewpurtell.com/news/monterrosa-family-confirms-settlement/
38. **Diante Yarber** https://www.scribd.com/document/378245631/Complaint-for-damages-filed-in-Yarber-case
39. **Pennsylvania** http://shakajohnsonlaw.com/attorneys.asp
40. **Eddie Irizarry** https://www.inquirer.com/news/philadelphia/eddie-irizarry-philadelphia-police-shooting-mark-dial-family-lawyer-20230822.html?
41. **South Carolina** https://bamberg-legal.com/about-us/
42. **Keith Lamont Scott** https://www.latimes.com/nation/la-na-police-shooting-lawyers-snap-story.html
43. **Alton Sterling** https://www.theadvocate.com/baton_rouge/news/crime_police/2014-ems-complaint-says-blane-salamoni-had-no-regard-for-victim-was-demeaning-at-fatal/article_38b910c4-b78c-11e9-ba9d-9792afa427dc.html
44. **Tennessee** https://www.electionsshelbytn.gov/andre-wharton/
45. **Tyrin Johnson** https://www.localmemphis.com/article/news/local/tyrin-johnsons-attorney-releases-statement-after-video-of-fatal-shooting-released/522-35f51c91-8a82-4e79-b75f-12dc83396699
46. **Texas** https://dwashlawfirm.com/attorneys/
47. **Utah** https://cjlaw.com/attorneys/karra-j-porter/
48. **Darrien Hunt** https://www.deseret.com/2015/1/1/20555779/saratoga-springs-police-illegally-shot-killed-darrien-hunt-lawsuit-claims/
49. **Washington** https://www.stritmatter.com/team/alicia-leduc-montgomery/

CHAPTER 43

Case and counsel index: A to C

Adam Toledo

- **Incident index title, not a verified court caption:** Shooting of Adam Toledo.
- **Reported counsel:** Adeena Weiss Ortiz, Weiss Ortiz.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Ah Mee Kun

- **Incident index title, not a verified court caption:** Fatal Fort Wayne police shooting in Indiana. (Public incident record)
- **Reported counsel and role:** Samuel Bolinger: Attorney identified in the family's wrongful-death and excessive-force lawsuit. (Public representation record)
- **Reported counsel and role:** Richard Thonert: Attorney identified in the family's wrongful-death and excessive-force lawsuit. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

Akai Gurley

- **Incident index title, not a verified court caption:** Shooting of Akai Gurley.
- **Reported counsel:** Scott Rynecki.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Alan Blueford

- **Incident index title, not a verified court caption:** Shooting of Alan Blueford.
- **Reported counsel:** Dan Siegel, Siegel, Yee, Brunner and Mehta (historical representation only); Walter Riley; John Burris, LAW OFFICES OF JOHN L. BURRIS.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Albert Ramon Dorsey

- **Incident index title, not a verified court caption:** Shooting of Albert Ramon Dorsey.
- **Reported counsel:** Brian Dunn, Cochran Firm.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Alex Nieto

- **Incident index title, not a verified court caption:** Shooting of Alex Nieto.
- **Reported counsel:** Adante Pointer, Lawyers For The People (Pointer & Buelna).
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Alex Pretti

- **Incident index title, not a verified court caption:** Fatal shooting during a federal immigration-enforcement operation. (Incident record)
- **Reported counsel:** Steve Schleicher, Maslon: Retained by Pretti's parents, Michael and Susan Pretti. (Representation record)

- **Reported counsel:** Anthony Cotton, Kuchler & Cotton: Separately retained by Pretti's sister, Micayla Pretti. (Representation record)
- **Investigation prompts:** Native video synchronization, officer identification, weapon possession and control, shot sequence, and medical response.
- **Record scope:** The January 2026 report establishes separate family retentions, not a filed civil complaint. Confirm later filings and the scope of each attorney's representation. (The Detroit News)

Alexander LaMorie

- **Verified proceeding title (shortened where noted):** Harrington v. Howard County.
- **Reported counsel:** Andrew Levy, Brown, Goldstein & Levy, LLP; Jamie Strawbridge, Brown, Goldstein & Levy, LLP; Neel Lalchandani, Brown, Goldstein & Levy, LLP; Michael Abrams, Brown, Goldstein & Levy, LLP; James Zafiropulos, Tornatore & Zafiropulos.
- **Investigation prompts:** Information about the crisis, communication, containment, commands, and changes in the perceived threat.

Alfred Olango

- **Incident index title, not a verified court caption:** Fatal police shooting in El Cajon, California. (Incident record)
- **Reported counsel:** Dan Gilleon: Family attorney identified in September 2016 reporting. (Representation record)
- **Investigation prompts:** Object identification, viewing distance, lighting, crisis information, commands, and the sequence of police actions.

Alton Sterling

- **Incident index title, not a verified court caption:** Shooting of Alton Sterling.

- **Reported counsel:** Mike Adams; Justin Bamberg, Bamberg Legal; L. Chris Stewart, Stewart Miller Simmons Trial Attorneys; Dale Glover, Law Office Of Dale O Glover; Brandon DeCuir, DeCuir, Clark & Adams, LLP.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Amadou Diallo

- **Incident index title, not a verified court caption:** Shooting of Amadou Diallo.
- **Reported counsel:** Anthony H. Gair, Gair, Gair, Conason, Rubinowitz, Bloom, Hershenhorn, Steigman & Mackauf (historical affiliation; former partner) (historical representation only).
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Amir Locke

- **Incident index title, not a verified court caption:** Shooting of Amir Locke.
- **Reported counsel:** Ben Crump, Ben Crump Law; Antonio Romanucci, Romanucci & Blandin; Jeff Storms, Newmark Storms Dworak LLC.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Andre Hill

- **Incident index title, not a verified court caption:** Shooting of Andre Hill.
- **Reported counsel:** Richard Schulte, Wright & Schulte LLC; Michael Wright, Wright & Schulte LLC; Ben Crump, Ben Crump Law.

- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Andres Guardado

- **Incident index title, not a verified court caption:** Shooting of Andres Guardado.
- **Reported counsel:** Adam Shea, Panish | Shea | Ravipudi LLP; Spencer Lucas, Panish | Shea | Ravipudi LLP; Ryan Casey, Panish | Shea | Ravipudi LLP; Nicholas Yoka, Panish | Shea | Ravipudi LLP.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Andrew Brown Jr

- **Incident index title, not a verified court caption:** Shooting of Andrew Brown Jr..
- **Reported counsel:** Harry Daniels, Law Offices of Harry M. Daniels; Chance Lynch, Lynch Law, PLLC; Chantel Lassiter, Chantel Cherry-Lassiter Law Office, PLLC (CCL LAW); Bakari Sellers, Strom Law Firm, L.L.C.; Ben Crump, Ben Crump Law.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Andrew Finch

- **Incident index title, not a verified court caption:** Fatal police shooting in Wichita, Kansas, after a swatting call. (Incident record)
- **Reported counsel:** Andrew M. Stroth, Action Injury Law Group: Family counsel identified in the Finch v. Rapp case account. (Representation record)
- **Reported counsel:** Alexa Van Brunt, MacArthur Justice Center: Family counsel identified in the Finch v. Rapp case account. (Representation record)

- **Reported counsel:** Easha Anand, MacArthur Justice Center: Family counsel identified in the Finch v. Rapp case account. (Representation record)
- **Reported counsel:** Rick Bailey: Kansas civil-rights counsel identified in the family's legal team. (Representation record)
- **Reported counsel:** Ben Stelter-Embry: Kansas civil-rights counsel identified in the family's legal team. (Representation record)
- **Investigation prompts:** Dispatch verification, approach and containment, lighting, commands, hand movements, and the interval before gunfire.
- **Record scope:** The MacArthur Justice Center identifies Finch v. Rapp and reports a March 2023 settlement. Bartlit Beck also appears in the team account, but the page does not identify an individual lawyer from that firm. (MacArthur Justice Center)

Andy Lopez

- **Incident index title, not a verified court caption:** Shooting of Andy Lopez.
- **Reported counsel:** Arnoldo Casillas, Casillas & Associates.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Angel Ramos

- **Incident index title, not a verified court caption:** Shooting of Angel Ramos.
- **Reported counsel:** Melissa Nold, Law Offices of John L. Burris.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Anthony Alvarez

- **Incident index title, not a verified court caption:** Shooting of Anthony Alvarez.

- **Reported counsel:** Chris Smith; Tania Dimitrova.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Anthony Hill

- **Verified proceeding title (shortened where noted):** Giummo v. Olsen.
- **Counsel identification:** No individual attorney was verified in the reviewed materials.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Anthony Lamar Smith

- **Incident index title, not a verified court caption:** Shooting of Anthony Lamar Smith.
- **Reported counsel:** Albert Watkins, Kodner Watkins, LC.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Anthony Lowe

- **Incident index title, not a verified court caption:** Shooting of Anthony Lowe.
- **Reported counsel:** Christian Contreras, Law Offices of Christian Contreras, PLC.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Anthony McClain

- **Incident index title, not a verified court caption:** Shooting of Anthony McClain.

- **Counsel identification:** No individual attorney was verified in the reviewed materials.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Antonio Arce

- **Incident index title, not a verified court caption:** Shooting of Antonio Arce.
- **Reported counsel:** Daniel Ortega, Ortega Law Firm.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Antonio Garza Jr.

- **Incident index title, not a verified court caption:** Fatal shooting by San Bernardino County sheriff's deputies in California. (Public incident record)
- **Reported counsel and role:** Rebecca Brown: Family-side attorney identified in the cited public record. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

Antwon Rose II

- **Incident index title, not a verified court caption:** Shooting of Antwon Rose II.
- **Reported counsel:** Fred Rabner, Rabner Law Offices, PC.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Ashli Babbitt

- **Incident index title, not a verified court caption:** Fatal shooting inside the United States Capitol. (Incident record)

- **Reported counsel:** Terrell N. Roberts III: Family attorney identified in April 2021 reporting, before the later settlement. (Representation record)
- **Reported counsel:** Robert Patrick Sticht, Judicial Watch, Inc.: Counsel for the Estate of Ashli Babbitt and Aaron Babbitt in the June 2025 joint status report. (Representation record)
- **Investigation prompts:** Doorway geometry, barriers, crowd movement, officer sight lines, warnings, and the timing of the shot.
- **Record scope:** The parties reported an executed settlement and a voluntary dismissal with prejudice on June 6, 2025. The filing does not establish a judicial finding that the shooting was unlawful. (Joint status report)

Ashtian Barnes

- **Incident index title, not a verified court caption:** Fatal shooting during a traffic stop in Harris County, Texas; the underlying incident in Barnes v. Felix. (Incident record)
- **Reported counsel:** Adam Fomby: Attorney for Barnes' family identified in appellate reporting. (Representation record)
- **Investigation prompts:** Vehicle movement, officer placement, the approach to the vehicle, and the full sequence before the shots.
- **Record scope:** The Supreme Court rejected the moment-of-threat restriction, but the Fifth Circuit again affirmed judgment for the defendants on remand. (Supreme Court opinion; Fifth Circuit opinion) The Supreme Court denied the later petition on April 27, 2026. (Docket 25-1005)

Atatiana Jefferson

- **Incident index title, not a verified court caption:** Shooting of Atatiana Jefferson.
- **Reported counsel:** John J. Coyle, McEldrew Purtell.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Bennie Edwards

- **Incident index title, not a verified court caption:** Shooting of Bennie Joe Edwards II.
- **Reported counsel:** Ben Crump, Ben Crump Law; Bhavani K. Raveendran, Romanucci & Blandin; Rachel Gusman, Graves McLain, PLLC.
- **Investigation prompts:** Information about the crisis, communication, containment, commands, and changes in the perceived threat.

Bijan Ghaisar

- **Incident index title, not a verified court caption:** Fatal U.S. Park Police shooting in Fairfax County, Virginia. (Incident record)
- **Reported counsel:** Roy Austin: Family lawyer identified in January 2018 reporting. (Representation record)
- **Reported counsel:** Thomas Connolly: Family lawyer identified in January 2018 reporting. (Representation record)
- **Investigation prompts:** Vehicle movement, officer positions at each stop, interagency recordings, and shot timing.
- **Record scope:** The April 2023 report described a civil settlement agreement awaiting judicial approval at that reporting date. Do not treat that report as a current docket check. (The Spokesman-Review)

Botham Jean

- **Incident index title, not a verified court caption:** Shooting of Botham Jean.
- **Reported counsel:** Ben Crump, Ben Crump Law; Daryl Washington, WASHINGTON LAW FIRM, P.C.; Brooke Cluse, Ben Crump Law; Gabrielle Higgins, Ben Crump Law Firm; Bhavani K. Raveendran, Romanucci & Blandin; Antonio Romanucci, Romanucci & Blandin; Colton M. Johnson Taylor, Romanucci & Blandin.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Brandon Combs

- **Incident index title, not a verified court caption:** Shooting of Brandon Combs.
- **Reported counsel:** Harry Daniels, Law Offices of Harry M. Daniels.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Brandon Durham

- **Incident index title, not a verified court caption:** Shooting of Brandon Durham.
- **Reported counsel:** Cannon Lambert, Karchmar & Lambert, P.C..
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Brendon Glenn

- **Verified proceeding title (shortened where noted):** Camprone v. City of Los Angeles.
- **Reported counsel:** V. James DeSimone, V. James DeSimone Law; John Raphling, The Law Office of John Raphling.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Breonna Taylor

- **Incident index title, not a verified court caption:** Shooting of Breonna Taylor.
- **Reported counsel:** Sam Aguiar, Sam Aguiar Injury Lawyers; Lonita Baker, Baker & Westbrook, PLLC; Ben Crump, Ben Crump Law.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Bryan Malinowski

- **Incident index title, not a verified court caption:** Fatal shooting during an ATF search-warrant operation at Malinowski's Arkansas home. (Incident record)
- **Reported counsel:** Bud Cummins: Attorney for Malinowski's family. (Representation record)
- **Reported counsel:** Deb Riordan, Riordan Law Firm: Plaintiff-side attorney identified in reporting on the estate's wrongful-death lawsuit. (Representation record)
- **Reported counsel:** Nathan Garrett: Attorney quoted in reporting on the estate's wrongful-death lawsuit. (Representation record)
- **Investigation prompts:** Warrant execution, identification of agents, occupant perception, visibility, firearm discharges, and injury attribution.
- **Record scope:** The May 2025 report describes the estate's civil filing and separately reports prosecutors' determination that the agents' force was justified. The civil allegations and the prosecutorial determination serve different procedural purposes. (Arkansas Business)

Cameron Lamb

- **Incident index title, not a verified court caption:** Shooting of Cameron Lamb.
- **Reported counsel:** Lee Merritt, MERRITT LAW FIRM, LLC; John J. Coyle, McEldrew Purtell.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Carlos Jimenez

- **Incident index title, not a verified court caption:** Nonfatal ICE shooting during a vehicle encounter in Ontario, California. (Public incident record)
- **Reported counsel and role:** Greg Jackson: Attorney identified as filing Jimenez's civil lawsuit. (Public representation record)

- **Investigation prompts:** Vehicle movements, agent positions, discharge direction, witness statements, recording preservation, and medical treatment.

Caroline Small

- **Incident index title, not a verified court caption:** Shooting of Caroline McGehee Small.
- **Reported counsel:** Nathan Williams.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Casey Goodson Jr

- **Incident index title, not a verified court caption:** Shooting of Casey Goodson Jr..
- **Reported counsel:** Sean Walton, Walton + Brown, LLP.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Cedrick Chatman

- **Incident index title, not a verified court caption:** Shooting of Cedrick Chatman.
- **Reported counsel:** Brian W. Coffman, Coffman Law Offices, P.C..
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Charles Kinsey

- **Incident index title, not a verified court caption:** Nonfatal police shooting of a behavioral therapist in North Miami, Florida. (Incident record)
- **Reported counsel:** Hilton Napoleon: Attorney for Charles Kinsey. (Representation record)

- **Reported counsel:** Matthew Dietz, Disability Independence Group: Attorney for Arnaldo Rios Soto and Gladys Soto, not identified as Kinsey's attorney. (Representation record)
- **Investigation prompts:** Object identification, commands, communication about disability, intended target, and actual bullet path.
- **Record scope:** The August 2016 interview identifies different clients for Napoleon and Dietz. A shared incident does not establish joint representation of every participant. (Democracy Now!)

Charly Keunang

- **Incident index title, not a verified court caption:** Shooting of Charly "Africa" Keunang.
- **Reported counsel:** Joshua Piovia-Scott, Hadsell Stormer Renick & Dai LLP; Dan Stormer, Hadsell Stormer Renick & Dai LLP; Shaleen Shanbhag, Hadsell Stormer Renick & Dai LLP.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Christian Diaz Rendon

- **Incident index title, not a verified court caption:** Fatal Phoenix police shooting during a response to a home intrusion; also reported as Christian Diaz. (Public incident record)
- **Reported counsel and role:** David Chami: Attorney for the plaintiffs in the civil lawsuit. (Public representation record)
- **Investigation prompts:** Caller and occupant identification, the physical struggle, visibility, commands, and the interval before gunfire.

Christian Hall

- **Incident index title, not a verified court caption:** Shooting of Christian Hall.
- **Reported counsel:** Ben Crump, Ben Crump Law; Devon Jacob, Jacob Litigation.

- **Investigation prompts:** Object identification, visibility, dispatch information, and the timing of commands and gunfire.

Corey Phillips

- **Verified proceeding title (shortened where noted):** Phillips v. Bodjanac.
- **Reported counsel:** Sarah Gelsomino, FG+G; Marcus Sidoti, FG+G; Elizabeth Bonham, FG+G.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

SOURCES

1. **Shooting of Adam Toledo** https://chicago.suntimes.com/crime/2026/05/28/adam-toledo-eric-stillman-chicago-police-cpd-shooting
2. **Weiss Ortiz** https://www.weissortizlaw.com/about
3. **Shooting of Akai Gurley** https://www.nbcnewyork.com/news/local/akai-gurley-family-daughter-lawsuit-shooting-peter-liang-pink-houses-garner/2099833/
4. **Scott Rynecki** https://wamu.org/story/15/02/02/grand_jury_awaits_evidence_in_nypd_shooting_of_unarmed_black_man/
5. **Shooting of Alan Blueford** https://abc7news.com/family-teen-killed-shot/94178/
6. **Siegel, Yee, Brunner and Mehta** https://www.mercurynews.com/2025/07/07/dan-siegel-oakland-berkeley-dead/
7. **Walter Riley** https://oaklandnorth.net/2012/10/08/blueford-family-attorneys-still-have-questions-after-release-of-police-documents/
8. **LAW OFFICES OF JOHN L. BURRIS** https://www.scribd.com/document/378245631/Complaint-for-damages-filed-in-Yarber-case
9. **Shooting of Albert Ramon Dorsey** https://www.courthousenews.com/case-of-lapd-shooting-at-fitness-club-likely-headed-to-trial
10. **Shooting of Alex Nieto** https://48hills.org/2014/08/neito-family-lawsuit-contradicts-sfpd-version-shooting/
11. **Adante Pointer** https://www.democracynow.org/2016/4/12/death_by_gentrification_alex_nieto_killed
12. **Lawyers For The People (Pointer & Buelna)** https://www.lawyersftp.com/about-us/
13. **Harrington v. Howard County** https://browngold.com/wp-content/uploads/2026/10/2026-10-29-Complaint.pdf
14. **Andrew Levy** https://browngold.com/news/the-family-of-25-year-old-person-with-autism-killed-by-howard-county-police-represented-by-bgl-have-filed-an-ada-rehabilitation-act-lawsuit/
15. **Shooting of Alton Sterling** https://abcnews.go.com/US/wireStory/alton-sterling-case-baton-rouge-nixes-5m-settlement-72940057
16. **Mike Adams** https://www.theadvocate.com/baton_rouge/news/crime_police/2014-ems-complaint-says-blane-salamoni-had-no-regard-for-victim-was-demeaning-at-fatal/article_38b910c4-b78c-11e9-ba9d-9792afa427dc.html
17. **Bamberg Legal** https://bamberg-legal.com/media/
18. **Stewart Miller Simmons Trial Attorneys** https://provenverdicts.com/stewart-miller-simmons-trial-attorneys/proven-verdicts/walter-scott-north-charleston-6-5-million-settlement
19. **Law Office Of Dale O Glover** https://lawyers.findlaw.com/louisiana/baton-rouge/5025037_1/
20. **DeCuir, Clark & Adams, LLP** https://decuirlaw.com/aboutus.html
21. **Shooting of Amadou Diallo** https://en.wikipedia.org/wiki/Anthony_H._Gair
22. **Gair, Gair, Conason, Rubinowitz, Bloom, Hershenhorn, Steigman & Mackauf (historical affiliation; former partner)** https://www.gairgair.com/about-the-firm.html

23. **Shooting of Amir Locke** https://bencrump.com/press/court-denies-minneapolis-attempt-to-dismiss-amir-locke-civil-rights-lawsuit/
24. **Ben Crump Law** https://bencrump.com/about/attorneys/ben-crump/
25. **Romanucci & Blandin** https://lawyers.law.cornell.edu/lawyer/antonio-m-romanucci-357167
26. **Newmark Storms Dworak LLC** https://news.stthomas.edu/publication-article/bending-the-arc-of-justice/
27. **Shooting of Andre Hill** https://yourlegalhelp.com/2020/12/27/wright-schulte-lawyers-to-help-lead-the-prosecution-of-claims-brought-by-the-family-of-andre-hill/
28. **Shooting of Andres Guardado** https://ktla.com/news/local-news/family-of-andres-guardado-teen-killed-by-deputy-files-wrongful-death-lawsuit-against-l-a-county-sheriffs-department
29. **Adam Shea** https://www.panish.law/2020/06/parents-of-andres-guardado-demand-answers-from-lasd-in-fatal-lasd-shooting-of-son/
30. **Shooting of Andrew Brown Jr.** https://www.wunc.org/news/2022-07-19/lawyers-in-andrew-brown-jr-case-seeking-1-2-million-in-fees
31. **Lynch Law, PLLC** https://www.lynchlaw.org/about
32. **Chantel Cherry-Lassiter Law Office, PLLC (CCL LAW)** https://ccllaw.org/
33. **Strom Law Firm, L.L.C.** https://stromlaw.com/bakari-sellers/
34. **Ben Crump** https://www.wavy.com/andrew-brown/attorneys-for-andrew-brown-jr-seeking-30-million-in-federal-lawsuit/
35. **Shooting of Andy Lopez** https://www.nbcbayarea.com/news/local/andy-lopez-family-to-file-federal-lawsuit-claiming-violation-of-fourth-amendment/1958442/
36. **Casillas & Associates** https://casillaslegal.com/?page_id=100
37. **Shooting of Angel Ramos** https://www.mercurynews.com/vallejo-police-detail-2017-angel-ramos-shooting-officer-cleared-by-da
38. **Law Offices of John L. Burris** https://fr.scribd.com/document/326782336/Gongora-et-al-v-CCSF-et-al
39. **Shooting of Anthony Alvarez** https://blockclubchicago.org/2022/03/15/no-charges-for-chicago-police-officers-who-shot-adam-toledo-anthony-alvarez-foxx-says
40. **Chris Smith** https://www.nbcchicago.com/investigations/chicago-police-move-to-fire-officer-in-anthony-alvarez-shooting-after-5-year-investigation-into-unrelated-severe-misconduct/3127065/
41. **Giummo v. Olsen** https://www.courthousenews.com/wp-content/uploads/2017/03/ANTHONY-HILL.pdf
42. **Shooting of Anthony Lamar Smith** https://app.ago.mo.gov/docs/default-source/reports/attorney-general-investigation-hal-goldsmith-non-privileged-report-12-5-17-2-.pdf
43. **Shooting of Anthony Lowe** https://www.independent.co.uk/news/world/americas/crime/anthony-lowe-lawsuit-huntington-park-b2274834.html
44. **Law Offices of Christian Contreras, PLC** https://contreras-law.com/attorneys
45. **Shooting of Anthony McClain** https://www.pasadenastarnews.com/2021/11/18/pasadena-settles-one-of-three-lawsuits-spurred-by-anthony-mcclain-shooting/
46. **Shooting of Antonio Arce** https://www.kitsapsun.com/story/news/local/tempe/2020/01/31/criminal-charges-tempe-police-officer-joseph-jaen-who-fatally-shot-14-year-old-antonio-arce/3887747002/
47. **Daniel Ortega** https://www.phoenixnewtimes.com/news/antonio-arces-family-wanted-answers-tempe-demanded-secrecy-11367171
48. **Ortega Law Firm** https://www.ortegalaw.com/ortega-team
49. **Shooting of Antwon Rose II** https://triblive.com/local/court-hearing-focuses-on-conflict-of-interest-allegations-by-pitt-against-antwon-rose-ii-estate-lawyer/
50. **Rabner Law Offices, PC** https://www.padisciplinaryboard.org/for-the-public/find-attorney/attorney-detail/77337
51. **Supreme Court opinion** https://www.supremecourt.gov/opinions/24pdf/23-1239_onjq.pdf
52. **Fifth Circuit opinion** https://law.justia.com/cases/federal/appellate-courts/ca5/22-20519/22-20519-2025-09-18.html
53. **Docket 25-1005** https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/25-1005.html
54. **Shooting of Atatiana Jefferson** https://mceldrewpurtell.com/news/11-25-million-settlement-atatiana-jefferson-civil-rights-case/
55. **McEldrew Purtell** https://mceldrewpurtell.com/news/monterrosa-family-confirms-settlement/
56. **Shooting of Bennie Joe Edwards II** https://www.rblaw.net/pressrelease-civil-lawsuit-filed-for-police-shooting-death-of-bennie

57. **Romanucci & Blandin** https://bencrump.com/press/family-of-botham-jean-and-their-legal-team-react-to-98-65-million-settlement-verdict/
58. **Ben Crump Law** https://bencrump.com/about/attorneys/brooke-cluse/
59. **Ben Crump Law Firm** https://bencrump.com/about/attorneys/gabrielle-higgins/
60. **Shooting of Brandon Combs** https://apnews.com/article/police-shootings-lawsuits-north-carolina-53e6dd005926d6603d294954d1313c8e
61. **Shooting of Brandon Durham** https://news3lv.com/news/local/two-years-after-brandon-durhams-fatal-shooting-family-continues-to-seek-accountability
62. **Karchmar & Lambert, P.C.** https://www.getthecannon.com/attorneys/cannon-lambert-attorney
63. **Camprone v. City of Los Angeles** https://www.vjamesdesimonelaw.com/brendon-glenn-media-kit/
64. **V. James DeSimone Law** https://www.vjamesdesimonelaw.com/
65. **The Law Office of John Raphling** https://www.vjamesdesimonelaw.com/state-and-federal-lawsuits-filed-in-lapd-shooting-of-brendon-glenn/
66. **Shooting of Breonna Taylor** https://bencrump.com/civil-rights-lawyer/breonna-taylors-lawyer/
67. **Sam Aguiar Injury Lawyers** https://aguiarinjurylawyers.com/about-us/meet-our-team/sam-aguiar/
68. **Baker & Westbrook, PLLC** https://lawyers.findlaw.com/kentucky/louisville/lonita-baker-NTM5NzE3NV8x/
69. **Shooting of Cameron Lamb** https://www.kansascity.com/news/local/crime/article252429343.html
70. **Shooting of Caroline McGehee Small** https://www.jacksonville.com/story/news/crime/2011/10/02/troubling-details-georgia-police-shooting/15888192007/
71. **Shooting of Casey Goodson Jr.** https://apnews.com/99ee2ad1dc88538d43c2f4d1b9e008fa
72. **Sean Walton** https://knpr.org/npr/2021-12/deputy-who-shot-casey-goodson-jr-5-times-back-charged-murder
73. **Walton + Brown, LLP** https://waltonbrownlaw.com/article/202/family-of-casey-goodson-jr-reaches-historic-7-million-settlement-with-franklin-county
74. **Shooting of Cedrick Chatman** https://coffmaninjurylaw.com/case-results/
75. **Brian W. Coffman** https://coffmaninjurylaw.com/brian-w-coffman/
76. **Shooting of Charly "Africa" Keunang** https://www.hadsellstormer.com/newsroom/2018/august/la-city-council-approves-1-95-million-settlement/
77. **Hadsell Stormer Renick & Dai LLP** https://www.hadsellstormer.com/newsroom/2018/may/settlement-reached-for-1-95-million-in-charly-af/
78. **Hadsell Stormer Renick & Dai LLP** https://www.hadsellstormer.com/our-attorneys/dan-stormer/
79. **Shooting of Christian Hall** https://www.poconorecord.com/story/news/courts/2022/08/03/christian-hall-fatal-hooting-suit-going-before-federal-grand-jury-family-says-bartonsville-poconos/65390000007/
80. **Jacob Litigation** https://jacoblitigation.com/author/devonjacob/
81. **Phillips v. Bodjanac** https://signalakron.org/wp-content/uploads/2026/11/phillips-v-bodjanac.pdf
82. **Public incident record** https://www.21alivenews.com/2026/10/16/family-16-year-old-killed-fwpd-police-action-shooting-suing-agency/
83. **Incident record** https://www.detroitnews.com/story/news/nation/2026/01/28/alex-pretti-family-retains-lawyers-who-helped-prosecute-the-george-floyd-case/88403358007
84. **Incident record** https://abcnews.com/news/story/us-deport-man-killed-police-southern-california-officials-424521 30
85. **Incident record** https://www.macarthurjustice.org/case/finch-v-rapp/
86. **Public incident record** https://www.nbclosangeles.com/news/local/family-awarded-verdict-fatal-san-bernardino-deputy-shooting/3959794/
87. **Incident record** https://lawandcrime.com/high-profile/attorney-for-ashli-babbitts-family-threatens-10m-lawsuit-says-capitol-police-opened-fire-for-no-legitimate-law-enforcement-purpose/
88. **Representation record** https://storage.courtlistener.com/recap/gov.uscourts.dcd.269659/gov.uscourts.dcd.269659.62.0.pdf
89. **Incident record** https://www.houstonchronicle.com/news/houston-texas/crime/article/harris-county-deputy-shooting-lawsuit-tossed-21218268.php
90. **Incident record** https://www.spokesman.com/stories/2023/apr/21/us-agrees-to-5-million-settlement-over-police-kill/
91. **Representation record** https://apnews.com/article/f2f6fa62f5d042a9ad21dda17ba3306d
92. **Incident record** https://www.arkansasbusiness.com/article/bryan-malinowski-wrongful-death-lawsuit-atf/

93. **Representation record** https://www.wfmz.com/news/area/lehighvalley/an-unbelievable-sequence-of-idiotic-events-family-attorney-addresses-wrongful-death-lawsuit-after-lehigh-valley/article_11905ef2-a8a8-4140-8512-61e55690217f.html
94. **Public incident record** https://www.ocregister.com/2026/11/10/fbi-agent-falsified-witness-statements-about-ontario-man-shot-by-ice-lawsuit-says/
95. **Incident record** https://www.democracynow.org/2016/8/2/all_he_has_is_a_toy
96. **Public incident record** https://ktar.com/arizona-news/phoenix-police-shooting-lawsuit

CHAPTER 44

Case and counsel index: D to H

Daniel Maldonado Díaz

- **Incident index title, not a verified court caption:** Fatal police shooting during a crisis response in Utuado, Puerto Rico. (Public incident record)
- **Reported counsel and role:** Wanda Valentín Custodio: Historical counsel for Daniel's mother and sister. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.
- **Record scope:** The ACLU of Puerto Rico separately published a notice of Custodio's passing. Her inclusion documents historical representation and does not identify a current outreach target. (ACLU of Puerto Rico notices)

Daniel Shaver

- **Incident index title, not a verified court caption:** Shooting of Daniel Shaver.
- **Reported counsel:** Marc J. Victor, The Attorneys For Freedom Law Firm.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Danquirs Franklin

- **Incident index title, not a verified court caption:** Shooting of Danquirs Franklin.

- **Reported counsel:** Luke Largess.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Darell Richards

- **Incident index title, not a verified court caption:** Shooting of Darell Richards.
- **Reported counsel:** Adante Pointer, Lawyers For The People (Pointer & Buelna); Melissa Nold, Law Offices of John L. Burris; Patrick Buelna, Pointer & Buelna, LLP.
- **Investigation prompts:** Object identification, visibility, dispatch information, and the timing of commands and gunfire.

Darrien Hunt

- **Incident index title, not a verified court caption:** Shooting of Darrien Hunt.
- **Reported counsel:** Robert Sykes; Karra Porter, Christensen & Jensen, PC (historical).
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Daunte Wright

- **Incident index title, not a verified court caption:** Shooting of Daunte Wright.
- **Reported counsel:** Antonio Romanucci, Romanucci & Blandin; Jeff Storms, Newmark Storms Dworak LLC.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Deborah Danner

- **Verified proceeding title (shortened where noted):** Danner v. City of New York.

- **Reported counsel:** Ricardo A. Aguirre.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Delrawn Small

- **Verified proceeding title (shortened where noted):** Albert v. City of New York.
- **Reported counsel:** David B. Rankin, Beldock Levine & Hoffman LLP.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Derek Jordan

- **Incident index title, not a verified court caption:** Shooting of Derek Jordan.
- **Reported counsel:** Antonio Romanucci, Romanucci & Blandin; Maura White, Romanucci & Blandin.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Desmond Franklin

- **Incident index title, not a verified court caption:** Shooting of Desmond Franklin.
- **Reported counsel:** Shean Williams, The Cochran Firm; Stanley Jackson, The Cochran Firm.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Diante Yarber

- **Verified proceeding title (shortened where noted):** Chandler v. City of Barstow.

- **Reported counsel:** John Burris, LAW OFFICES OF JOHN L. BURRIS; Daryl Washington, WASHINGTON LAW FIRM, P.C.; Lee Merritt, MERRITT LAW FIRM, LLC.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Dijon Kizzee

- **Incident index title, not a verified court caption:** Shooting of Dijon Kizzee.
- **Reported counsel:** Ben Crump, Ben Crump Law; Carl Douglas, Douglas / Hicks Law, APC; Dale K. Galipo, The Law Offices of Dale K. Galipo.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Dion Johnson

- **Incident index title, not a verified court caption:** Shooting of Dion Johnson.
- **Reported counsel:** David Dow, Dow Law Office; Jennifer Ghidotti.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Dolal Idd

- **Incident index title, not a verified court caption:** Shooting of Dolal Idd.
- **Reported counsel:** Paul Bosman.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Donnie Sanders

- **Verified proceeding title (shortened where noted):** Sanders v. Newton.
- **Reported counsel:** John J. Coyle, McEldrew Purtell; Robert L. Kinsman, Krause and Kinsman Law Firm; Adam W. Krause, Krause and Kinsman Law Firm.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Donovan Lewis

- **Incident index title, not a verified court caption:** Shooting of Donovan Lewis.
- **Reported counsel:** Rex Elliott, Cooper and Elliott; Ben Cooper, Cooper Elliott; Michael Wright, Wright & Schulte LLC.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Dontre Hamilton

- **Incident index title, not a verified court caption:** Fatal police shooting at Red Arrow Park in Milwaukee, Wisconsin. (Incident record)
- **Reported counsel:** Jonathan Safran: Attorney for the Hamilton family identified in settlement reporting. (Representation record)
- **Investigation prompts:** Initial contact, grounds for the pat-down, crisis information, physical interaction, and the sequence of shots.
- **Record scope:** The May 2017 report describes a tentative settlement awaiting city approvals. The same report identifies a ruling on the pat-down, not a final ruling that every later use of force was unlawful. (Milwaukee Journal Sentinel)

Douglas Zerby

- **Verified proceeding title (shortened where noted):** Zerby v. City of Long Beach.
- **Reported counsel:** Garo Mardirossian, Mardirossian Akaragian LLP.

- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Duncan Lemp

- **Incident index title, not a verified court caption:** Fatal police shooting during a no-knock search-warrant operation in Potomac, Maryland. (Incident record)
- **Reported counsel:** Rene Sandler: Family attorney identified in the historical reporting. (Representation record)
- **Reported counsel:** Jon Fellner: Family attorney identified in the historical reporting. (Representation record)
- **Reported counsel:** Cary Hansel: Attorney identified as representing Kasey Robinson. (Representation record)
- **Investigation prompts:** Entry geometry, occupant location, weapon access, police identification, and the competing accounts of the firing sequence.
- **Record scope:** A January 6, 2025 order in Lemp v. Majkrzak allowed an amended complaint in part and dismissed specified probable-cause claims. The order is not a final liability determination for every claim. (District-court order)

Eddie Irizarry

- **Incident index title, not a verified court caption:** Shooting of Eddie Irizarry.
- **Reported counsel:** Shaka Johnson.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Edward Garner

- **Incident index title, not a verified court caption:** Fatal police shooting of a fleeing teenager in Memphis, Tennessee; the underlying incident in Tennessee v. Garner. (Incident record)

- **Reported counsel:** Walter Bailey: Counsel for Cleamtee Garner in the lower courts. (Representation record)
- **Reported counsel:** Steven Winter, NAACP Legal Defense and Education Fund: Supreme Court advocate for the Garner family. (Representation record)
- **Investigation prompts:** Escape route, lighting, observed weapon information, officer perception, and the basis for deadly force against a fleeing person.

Elijah Isham

- **Incident index title, not a verified court caption:** Fatal Moraine police shooting in Ohio; the underlying incident in Estate of Isham v. Richardson. (Public incident record)
- **Reported counsel and role:** Kyle Mothershead, Relentless Advocacy, PLLC: Counsel for the estate on appeal. (Public representation record)
- **Reported counsel and role:** Steven Compton: Counsel listed on the estate's appellate brief. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.
- **Record scope:** The cited appeal concerns representation of the estate and the validity of its complaint, not an adjudication that the shooting was unlawful. (Sixth Circuit opinion)

Eric Harris

- **Incident index title, not a verified court caption:** Shooting of Eric Harris.
- **Reported counsel:** Dan Smolen, Smolen & Roytman.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Erik Cantu

- **Incident index title, not a verified court caption:** Shooting of Erik Cantu.
- **Reported counsel:** Ben Crump, Ben Crump Law; Leslie M. Bearden.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Erik Salgado

- **Incident index title, not a verified court caption:** Shooting of Erik Salgado.
- **Reported counsel:** John Burris, LAW OFFICES OF JOHN L. BURRIS; Ben Nisenbaum, Burris Nisenbaum Curry & Lacy.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Evelyn Valdés

- **Incident index title, not a verified court caption:** Fatal shooting of a bystander during Miami police gunfire in Wynwood. (Public incident record)
- **Reported counsel and role:** Ramon Rasco, Podhurst Orseck: Family-side attorney identified in the cited public record. (Public representation record)
- **Reported counsel and role:** Angelo Martin, Podhurst Orseck: Co-counsel for the family. (Public representation record)
- **Investigation prompts:** Lines of fire, occupied vehicles, bystander locations, bullet attribution, and the emergency-response timeline.

Ezell Ford

- **Incident index title, not a verified court caption:** Shooting of Ezell Ford.
- **Reported counsel:** Boris Treyzon, ACTS Law.

- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Fanta Bility

- **Incident index title, not a verified court caption:** Shooting of Fanta Bility.
- **Reported counsel:** Bruce Castor, van der Veen, Hartshorn & Levin; Michael van der Veen, van der Veen, Hartshorn & Levin.
- **Investigation prompts:** Shooter identification, lines of fire, intervening objects, and attribution of each injury.

Flint Farmer

- **Incident index title, not a verified court caption:** Shooting of Flint Farmer.
- **Counsel identification:** No individual attorney was verified in the reviewed materials.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Gregory Allen Kase

- **Incident index title, not a verified court caption:** Fatal shooting by Monroe County sheriff's deputies at a Henrietta hotel in New York. (Public incident record)
- **Reported counsel and role:** Elliot Shields: Attorney identified as filing the family's federal complaint. (Public representation record)
- **Investigation prompts:** Dispatch information, hearing disability, communication, doorway geometry, weapon visibility, and the interval from entry to gunfire.

Hannah Fizer

- **Incident index title, not a verified court caption:** Shooting of Hannah Fizer.

- **Counsel identification:** No individual attorney was verified in the reviewed materials.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Harith Augustus

- **Incident index title, not a verified court caption:** Shooting of Harith Augustus.
- **Reported counsel:** Renee Spence, Loevy + Loevy; Scott Rauscher, Loevy + Loevy; Locke Bowman, Loevy + Loevy; Danielle Hamilton, Northwestern Pritzker School of Law.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

SOURCES

1. **Shooting of Daniel Shaver** https://attorneysforfreedom.com/high-profile-cases/daniel-shaver-case/
2. **Shooting of Danquirs Franklin** https://www.charlotteobserver.com/news/local/crime/article277247573.html
3. **Shooting of Darell Richards** https://www.sacbee.com/news/local/article268112497.html
4. **Adante Pointer** https://www.sacbee.com/news/local/article267232292.html
5. **Lawyers For The People (Pointer & Buelna)** https://www.lawyersftp.com/about-us/
6. **Law Offices of John L. Burris** https://fr.scribd.com/document/326782336/Gongora-et-al-v-CCSF-et-al
7. **Pointer & Buelna, LLP** https://www.lawyersftp.com/
8. **Shooting of Darrien Hunt** https://kutv.com/news/local/officers-dispute-allegations-in-darrien-hunt-lawsuit
9. **Robert Sykes** https://www.deseret.com/2015/1/1/20555779/saratoga-springs-police-illegally-shot-killed-darrien-hunt-lawsuit-claims/
10. **Christensen & Jensen, PC (historical)** https://www.avvo.com/attorneys/84111-ut-karra-porter-202718.html
11. **Shooting of Daunte Wright** https://www.robinskaplan.com/services/personal-injury-attorneys
12. **Antonio Romanucci** https://www.mprnews.org/story/2022/06/22/attorneys-daunte-wright-family-has-a-325m-settlement-agreement-with-city-of-brooklyn-center
13. **Romanucci & Blandin** https://lawyers.law.cornell.edu/lawyer/antonio-m-romanucci-357167
14. **Newmark Storms Dworak LLC** https://news.stthomas.edu/publication-article/bending-the-arc-of-justice/
15. **Danner v. City of New York** https://storage.courtlistener.com/recap/gov.uscourts.nysd.486667/gov.uscourts.nysd.486667.9.0.pdf
16. **Albert v. City of New York** https://storage.courtlistener.com/recap/gov.uscourts.nyed.403884/gov.uscourts.nyed.403884.114.0.pdf
17. **Shooting of Derek Jordan** https://chicago.suntimes.com/public-safety/2026/08/10/derek-jordan-shooting-cpd-police-traffic-stop-family-lawsuit-romanucci
18. **Antonio Romanucci** https://blockclubchicago.org/2026/08/10/officer-who-fatally-shot-derek-jordan-came-in-unjustifiably-hot-attorney-says-in-filing-lawsuit
19. **Shooting of Desmond Franklin** https://www.cleveland.com/metro/2020/05/attorneys-man-killed-by-off-duty-cleveland-cop-never-threatened-officer-or-flashed-gun.html
20. **Chandler v. City of Barstow** https://www.scribd.com/document/378245631/Complaint-for-damages-filed-in-Yarber-case

21. **Shooting of Dijon Kizzee** https://www.nbclosangeles.com/news/local/dijon-kizzee-family-claim-los-angeles-county-sheriff-shooting/2524708/
22. **Ben Crump** https://abc7.com/police-shooting-deputy-los-angeles-county-sheriff-la/6403481/
23. **Ben Crump Law** https://bencrump.com/about/attorneys/ben-crump/
24. **Douglas / Hicks Law, APC** https://profiles.superlawyers.com/california/los-angeles/lawyer/carl-douglas/ed179d74-5ae3-49a8-b419-b278573afcd5.html
25. **The Law Offices of Dale K. Galipo** https://www.galipolaw.com/
26. **Shooting of Dion Johnson** https://www.phoenixnewtimes.com/news/dion-johnson-death-lawsuit-focuses-on-dps-troopers-dishonesty-11557813/
27. **Dow Law Office** https://www.avvo.com/attorneys/85251-az-david-dow-407589.html
28. **Shooting of Dolal Idd** https://www.twincities.com/2024/03/26/bca-case-files-lawsuit-families-settlement/
29. **Sanders v. Newton** https://caselaw.findlaw.com/court/us-8th-circuit/116597532.html
30. **McEldrew Purtell** https://mceldrewpurtell.com/news/monterrosa-family-confirms-settlement/
31. **Krause and Kinsman Law Firm** https://www.bestlawyers.com/lawyers/robert-l-kinsman/346616
32. **Krause and Kinsman Law Firm** https://www.bestlawyers.com/lawyers/adam-w-krause/347391
33. **Shooting of Donovan Lewis** https://www.oklahoman.com/story/news/courts/2023/02/16/donovan-lewis-family-filing-suit-against-columbus-cop-who-shot-him/69907940007/
34. **Cooper and Elliott** https://www.dispatch.com/story/news/local/2022/09/01/fatal-columbus-police-shooting-of-donovan-lewis/65467821007/
35. **Cooper Elliott** https://cooperelliott.com/attorneys/c-benjamin-cooper/
36. **Wright & Schulte LLC** https://yourlegalhelp.com/2020/12/27/wright-schulte-lawyers-to-help-lead-the-prosecution-of-claims-brought-by-the-family-of-andre-hill/
37. **Zerby v. City of Long Beach** https://www.garolaw.com/civil-rights/
38. **Garo Mardirossian** https://www.garolaw.com/case-directory/zerby-v-city-of-long-beach-2016/
39. **Shooting of Eddie Irizarry** https://ground.news/article/99dcf353-f54f-4704-9fc5-f395e728e4ef
40. **Shaka Johnson** https://www.inquirer.com/news/philadelphia/eddie-irizarry-philadelphia-police-shooting-mark-dial-family-lawyer-20230822.html?
41. **Shooting of Eric Harris** https://ktul.com/news/local/tulsa-county-reaches-6-million-settlement-in-eric-harris-death
42. **Dan Smolen** https://www.publicradiotulsa.org/local-regional/2018-03-09/tulsa-county-to-pay-6m-civil-rights-settlement-to-eric-harris-estate
43. **Smolen & Roytman** https://www.srlawok.com/our-attorneys/dan-smolen
44. **Shooting of Erik Cantu** https://www.ksat.com/news/local/2024/04/15/erik-cantu-emily-proulx-file-civil-lawsuit-against-james-brennand-san-antonio-over-2022-mcdonalds-shooting/
45. **Shooting of Erik Salgado** https://www.eastbaytimes.com/2020/07/13/it-was-a-massacre-family-of-man-fatally-shot-by-chp-announce-lawsuit/
46. **John Burris** https://www.cbsnews.com/sanfrancisco/news/eric-salgado-oakland-shooting-chp-agrees-7-million-settlement-wrongful-death-lawsuit-john-burris/
47. **Burris Nisenbaum Curry & Lacy** https://www.lawdragon.com/lawyers/burris-nisenbaum-curry-lacy/ben-nisenbaum
48. **Shooting of Ezell Ford** https://www.latimes.com/local/lanow/la-me-ln-ezell-ford-lawsuit-20161101-story.html
49. **ACTS Law** https://actslaw.com/meet-our-attorneys/boris-treyzon/
50. **Shooting of Fanta Bility** https://www.delcotimes.com/2023/10/01/11m-settlement-reached-in-federal-suits-in-the-fatal-shooting-of-fanta-bility-and-wounding-of-others/
51. **Bruce Castor** https://www.delcotimes.com/2021/10/27/family-of-slain-8-year-old-files-wrongful-death-suit
52. **van der Veen, Hartshorn & Levin** https://profiles.superlawyers.com/pennsylvania/philadelphia/lawyer/bruce-l-castor-jr/89458f19-4453-4926-ae6b-f0c763fec183.html
53. **van der Veen, Hartshorn & Levin** https://www.mtvlaw.com/our-firm/michael-t-van-der-veen/
54. **Shooting of Flint Farmer** https://www.rblaw.net/practices-deadly-or-wrongful-shooting
55. **Shooting of Hannah Fizer** https://www.kctv5.com/news/local_news/independent-counsel-appointed-in-case-of-hannah-fizer/article_5e6ebcdc-d6b3-11ea-bcfb-afe200ec39ab.html
56. **Shooting of Harith Augustus** https://www.loevy.com/press-release-appellate-court-orders-new-trial-in-police-shooting-lawsuit/
57. **Northwestern Pritzker School of Law** https://www.law.northwestern.edu/faculty/profiles/DanielleHamilton/

58. **Public incident record** https://www.aclu-pr.org/press-releases/aclu-of-puerto-rico-sues-the-police-over-the-killing-of-a-war-veteran/
59. **ACLU of Puerto Rico notices** https://www.aclu-pr.org/press-releases/page/3/
60. **Incident record** https://www.kitsapsun.com/story/news/crime/2017/05/09/city-milwaukee-reaches-tentative-23-million-settlement-dontre-hamilton-case/101487358/
61. **Incident record** https://www.courtlistener.com/opinion/10308086/lemp-v-majkrzak/
62. **Representation record** https://www.nbcwashington.com/news/local/no-charges-for-police-in-death-of-boogaloo-movement-martyr/2525799/
63. **Incident record** https://www.nbcnews.com/news/nbcblk/officer-killed-unarmed-teen-1974-it-changed-how-police-justify-n1120611
64. **Public incident record** https://law.justia.com/cases/federal/appellate-courts/ca6/25-3942/25-3942-2026-11-02.html
65. **Public incident record** https://www.nbcmiami.com/news/local/family-sues-city-of-miami-over-fatal-police-shooting-in-wynwood/3832295
66. **Public incident record** https://www.wxxinews.org/local-news/2026-11-13/federal-complaint-filed-against-monroe-county-sheriffs-office-in-august-shooting-of-deaf-man

CHAPTER 45

Case and counsel index: I to M

Isaiah Lewis

- **Verified proceeding title (shortened where noted):** Lewis v. City of Edmond.
- **Reported counsel:** David J. Batton, Law Office of David J. Batton; Andrew M. Stroth, Action Injury Law Group, LLC; Carlton Odim, Action Injury Law Group, LLC.
- **Investigation prompts:** Information about the crisis, communication, containment, commands, and changes in the perceived threat.

Isak Aden

- **Verified proceeding title (shortened where noted):** Aden v. City of Bloomington.
- **Reported counsel:** Matthew Lawlyes.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Jacob Blake

- **Incident index title, not a verified court caption:** Nonfatal police shooting in Kenosha, Wisconsin. (Incident record)
- **Reported counsel:** Ben Crump: Counsel for Jacob Blake in the civil action. (Representation record)
- **Reported counsel:** Patrick A. Salvi II, Salvi Schostok and Pritchard: Counsel for Jacob Blake in the civil action. (Representation record)
- **Reported counsel:** B'Ivory LaMarr, The LaMarr Firm, PLLC: Counsel for Jacob Blake in the civil action. (Representation record)

- **Investigation prompts:** Vehicle access, hand movements, weapon visibility, commands, and the sequence of individual shots.
- **Record scope:** The May 2022 report records dismissal with prejudice of Blake's civil suit; the reported representation is historical. (TMJ4/KBZK)

Jalen Randle

- **Verified proceeding title (shortened where noted):** Searles v. City of Houston.
- **Reported counsel:** Eli Hare, DiCello Levitt Gutzler; Justin James Hawal, DiCello Levitt L.L.P.; Larry Frances Taylor, Jr., Cochran Firm.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Jamar Clark

- **Incident index title, not a verified court caption:** Shooting of Jamar Clark.
- **Reported counsel:** David Suro, Suro Law; William Starr.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

James Boyd

- **Incident index title, not a verified court caption:** Shooting of James Boyd.
- **Reported counsel:** Joe Kennedy, Kennedy Law Firm.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

James Rosano

- **Incident index title, not a verified court caption:** Fatal Nassau County police shooting in Carle Place, New York. (Public incident record)
- **Reported counsel and role:** Bob Fallarino: Attorney for Lawrence and Janet Rosano, the victim's parents. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

Jaque Rabon

- **Incident index title, not a verified court caption:** Fatal deputy-involved shooting in Riverside, California. (Public incident record)
- **Reported counsel and role:** Dale K. Galipo: Family-side attorney identified in the cited public record. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

Jayland Walker

- **Verified proceeding title (shortened where noted):** Walker v. City of Akron.
- **Reported counsel:** Bobby DiCello, DiCello Levitt; Kenneth Abbarno, DiCello Levitt.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Jaylen Lewis

- **Incident index title, not a verified court caption:** Fatal Mississippi Capitol Police shooting in Jackson. (Public incident record)

- **Reported counsel and role:** Bobby DiCello, DiCello Levitt: Family-side attorney identified in the cited public record. (Public representation record)
- **Reported counsel and role:** Kenneth Abbarno, DiCello Levitt: Family-side attorney identified as Ken Abbarno in the release. (Public representation record)
- **Reported counsel and role:** Joseph Frate, DiCello Levitt: Family-side attorney identified in the cited public record. (Public representation record)
- **Reported counsel and role:** Jordyn Parks, DiCello Levitt: Family-side attorney identified in the cited public record. (Public representation record)
- **Reported counsel and role:** L.N. Chandler Rogers, Rogers Law Group: Family-side attorney identified in the cited public record. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

Jesse Dominguez

- **Incident index title, not a verified court caption:** Fatal California Highway Patrol shooting on the 105 Freeway in Watts. (Public incident record)
- **Reported counsel and role:** Luis Carrillo: Attorney for the plaintiffs identified in reporting on the civil lawsuit. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

Jesse Romero

- **Incident index title, not a verified court caption:** Shooting of Jesse Romero.
- **Reported counsel:** Humberto Guízar, Law Offices of Humberto Guizar; historically also Guizar Henderson and Carrazco.

- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Jimmy Atchison

- **Incident index title, not a verified court caption:** Shooting of Jimmy Atchison.
- **Reported counsel:** Tanya Miller.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

John Andrew Jenuwine

- **Incident index title, not a verified court caption:** Fatal shooting by Washtenaw County sheriff's deputies in Ypsilanti, Michigan; also reported as Andrew Jenuwine. (Public incident record)
- **Reported counsel and role:** Todd Flood, Flood Law: Family-side attorney identified in the cited public record. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

John Crawford III

- **Incident index title, not a verified court caption:** Shooting of John Crawford III.
- **Reported counsel:** Michael Wright, Wright & Schulte LLC.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

John Geer

- **Incident index title, not a verified court caption:** Fatal police shooting at Geer's home in Fairfax County, Virginia. (Incident record)

- **Reported counsel:** Michael Lieberman: Lawyer for the Geer family and Maura Harrington in the reported civil suit. (Representation record)
- **Investigation prompts:** Doorway geometry, hand positions, officer communications, witness sight lines, and preservation of internal investigative records.

Jonathan Ferrell

- **Incident index title, not a verified court caption:** Shooting of Jonathan Ferrell.
- **Reported counsel:** Charles Monnett, Maginnis Howard.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Jonathan Price

- **Incident index title, not a verified court caption:** Shooting of Jonathan Price.
- **Reported counsel:** Lee Merritt, MERRITT LAW FIRM, LLC.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Jordan Edwards

- **Incident index title, not a verified court caption:** Shooting of Jordan Edwards.
- **Reported counsel:** Jasmine Crockett; Daryl Washington, WASHINGTON LAW FIRM, P.C..
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

José Antonio Elena Rodríguez

- **Incident index title, not a verified court caption:** Cross-border shooting at Nogales, involving a U.S. Border Patrol agent and a teenager on the Mexican side of the border. (Incident record)
- **Reported counsel:** Lee Gelernt, ACLU Immigrants' Rights Project: Counsel identified in the mother's July 2014 civil filing announcement. (Representation record)
- **Reported counsel:** Luis Parra: Counsel identified in the mother's July 2014 civil filing announcement. (Representation record)
- **Reported counsel:** Roberto C. Montiel, Roberto Montiel Law Offices: Counsel identified in the mother's July 2014 civil filing announcement. (Representation record)
- **Reported counsel:** Dan Pochoda, ACLU of Arizona: Counsel identified in the mother's July 2014 civil filing announcement. (Representation record)
- **Reported counsel:** James Lyall, ACLU of Arizona: Counsel identified in the mother's July 2014 civil filing announcement. (Representation record)
- **Reported counsel:** Andre Segura, ACLU Immigrants' Rights Project: Counsel identified in the mother's July 2014 civil filing announcement. (Representation record)
- **Reported counsel:** Dror Ladin, ACLU Immigrants' Rights Project: Counsel identified in the mother's July 2014 civil filing announcement. (Representation record)
- **Reported counsel:** Cecillia Wang, ACLU Immigrants' Rights Project: Counsel identified in the mother's July 2014 civil filing announcement. (Representation record)
- **Reported counsel:** Mitra Ebadolahi, ACLU of San Diego and Border Litigation Project: Counsel identified in the mother's July 2014 civil filing announcement. (Representation record)
- **Reported counsel:** Arturo Gonzalez, Morrison and Foerster LLP: Counsel identified in the mother's July 2014 civil filing announcement. (Representation record)

- **Reported counsel:** Hector Suarez, Morrison and Foerster LLP: Counsel identified in the mother's July 2014 civil filing announcement. (Representation record)
- **Investigation prompts:** Border geometry, elevation, shooter and decedent locations, trajectories, and the legal basis for each asserted remedy.
- **Record scope:** The ACLU announcement records the filing as Rodriguez v. John Does. The account presents the plaintiff's position and historical counsel affiliations; it is not a current procedural-status report. (ACLU filing announcement)

Jose Enrique Cartagena Chacon

- **Incident index title, not a verified court caption:** Fatal Lenexa police shooting in Kansas; also reported as Jose Enrique Cartagena-Chacon. (Public incident record)
- **Reported counsel and role:** Matthew Quinn: Attorney identified in reporting on the estate's civil lawsuit. (Public representation record)
- **Reported counsel and role:** Thomas Bowers: Family attorney identified in the earlier public response to the charging decision. (Public representation record)
- **Reported counsel and role:** Quinn Rallins: Family attorney identified in the earlier public response to the charging decision. (Public representation record)
- **Investigation prompts:** Parked-vehicle geometry, officer identification, lighting, the object in the occupant's hands, and command timing.

Jose Guerena

- **Incident index title, not a verified court caption:** Fatal SWAT shooting during a raid at Guerena's home near Tucson, Arizona. (Incident record)
- **Reported counsel:** Peter Limperis: Attorney for Vanessa Guerena in the settled civil case. (Representation record)

- **Investigation prompts:** Entry procedure, firearm condition, officer sight lines, individual discharge attribution, and the medical-response timeline.
- **Record scope:** The September 2013 report records a settlement without an admission of wrongdoing. The reported attorney connection concerns that historical civil case. (Arizona Daily Star)

Joseph Mann

- **Incident index title, not a verified court caption:** Shooting of Joseph Mann.
- **Reported counsel:** John Burris, LAW OFFICES OF JOHN L. BURRIS.
- **Investigation prompts:** Information about the crisis, communication, containment, commands, and changes in the perceived threat.

Joshua Feast

- **Incident index title, not a verified court caption:** Shooting of Joshua Feast.
- **Reported counsel:** Ben Crump, Ben Crump Law.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Joshua Musselman

- **Incident index title, not a verified court caption:** Fatal Spokane police shooting in Washington. (Public incident record)
- **Reported counsel and role:** Rondi Thorp: Family-side attorney identified in the cited public record. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

Justine Ruszczyk Damond

- **Incident index title, not a verified court caption:** Shooting of Justine Ruszczyk Damond.

- **Reported counsel:** Robert Bennett, Robins Kaplan LLP.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Kajieme Powell

- **Incident index title, not a verified court caption:** Shooting of Kajieme Powell.
- **Reported counsel:** Jermaine Wooten, The Legal Solution Group.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Kawaski Trawick

- **Incident index title, not a verified court caption:** Shooting of Kawaski Trawick.
- **Counsel identification:** No individual attorney was verified in the reviewed materials.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Keita O'Neil

- **Incident index title, not a verified court caption:** Shooting of Keita O’Neil.
- **Reported counsel:** Brian Ford.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Keith Lamont Scott

- **Incident index title, not a verified court caption:** Shooting of Keith Lamont Scott.
- **Reported counsel:** Justin Bamberg, Bamberg Legal.

- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Kenneth Harding

- **Incident index title, not a verified court caption:** Shooting of Kenneth Harding Jr..
- **Reported counsel:** John Burris, LAW OFFICES OF JOHN L. BURRIS.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Kohen Wiley

- **Incident index title, not a verified court caption:** Fatal shooting of a child during police gunfire into a vehicle in Senatobia, Mississippi. (Public incident record)
- **Reported counsel and role:** Ben Crump: Family-side attorney identified in the cited public record. (Public representation record)
- **Investigation prompts:** Vehicle path, occupant positions, officer location, individual shot direction, and wound attribution.

Kristopher Handy

- **Incident index title, not a verified court caption:** Fatal Anchorage police shooting in Alaska. (Public incident record)
- **Reported counsel and role:** James Roberts, Palmer Perlstein: Family-side attorney identified in the cited public record. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

Laquan McDonald

- **Incident index title, not a verified court caption:** Shooting of Laquan McDonald.

- **Reported counsel:** Jeffrey Neslund; Michael Robbins.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Linden Cameron

- **Incident index title, not a verified court caption:** Shooting of Linden Cameron.
- **Counsel identification:** No individual attorney was verified in the reviewed materials.
- **Investigation prompts:** Information about the crisis, communication, containment, commands, and changes in the perceived threat.

Luis Gongora Pat

- **Incident index title, not a verified court caption:** Shooting of Luis Gongora Pat.
- **Reported counsel:** John Burris, LAW OFFICES OF JOHN L. BURRIS; Melissa Nold, Law Offices of John L. Burris; Adante Pointer, Lawyers For The People (Pointer & Buelna).
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Ma'Khia Bryant

- **Incident index title, not a verified court caption:** Shooting of Ma'Khia Bryant.
- **Reported counsel:** Michelle Martin, The Martin Law Firm.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Mansur Ball-Bey

- **Verified proceeding title (shortened where noted):** Ball-Bey v. Chandler.

- **Reported counsel:** Javad M. Khazaeli, Khazaeli Wyrsch; Jack Waldron, Khazaeli Wyrsch; Jermaine Wooten, The Legal Solution Group; Alicia Campbell, Campbell Law.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Manuel Diaz

- **Verified proceeding title (shortened where noted):** Estate of Diaz v. City of Anaheim, No. 14-55644.
- **Counsel identification:** No individual attorney was verified in the reviewed materials.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Manuel Paez Terán

- **Incident index title, not a verified court caption:** Fatal Georgia State Patrol shooting near the Atlanta Public Safety Training Center; also indexed as Manuel Teran and Tortuguita. (Incident record)
- **Reported counsel:** Brian Spears: Attorney identified in reporting on the family's civil lawsuit. (Representation record)
- **Investigation prompts:** Shooter identification, ballistic attribution, wound paths, available recordings, and competing accounts of the initial gunfire.
- **Record scope:** The December 2024 report describes a filed lawsuit and the family's allegations, not findings of liability. (WSB-TV)

Marimar Martinez

- **Incident index title, not a verified court caption:** Nonfatal Border Patrol shooting during a vehicle encounter in Chicago. (Public incident record)

- **Reported counsel and role:** Christopher Parente, Cheronis & Parente: Attorney representing Martinez and discussing her civil lawsuit. (Public representation record)
- **Reported counsel and role:** Damon M. Cheronis, Cheronis & Parente: Counsel in the related criminal proceeding; this citation does not establish a civil-case appearance. (Public representation record)
- **Investigation prompts:** Vehicle contact, roadway geometry, firearm discharge direction, recordings, and differences between contemporaneous reports and later accounts.

Mario Woods

- **Incident index title, not a verified court caption:** Shooting of Mario Woods.
- **Reported counsel:** John Burris, LAW OFFICES OF JOHN L. BURRIS; Adante Pointer, Lawyers For The People (Pointer & Buelna).
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Mark Hopkins

- **Incident index title, not a verified court caption:** Fatal police shooting during a College Station residential raid in Texas. (Public incident record)
- **Reported counsel and role:** Bradford J. Gilde, Gilde Law Firm, PLLC: Counsel for the family and Alyssa Wilson. (Public representation record)
- **Reported counsel and role:** Thad D. Spalding, Durham, Pittard & Spalding LLP: Counsel for the family and Alyssa Wilson. (Public representation record)
- **Reported counsel and role:** Shelby J. White, Durham, Pittard & Spalding LLP: Counsel for the family and Alyssa Wilson. (Public representation record)

- **Reported counsel and role:** Aaron W. Perry, Aaron Perry Law Firm: Counsel for the family and Alyssa Wilson. (Public representation record)
- **Investigation prompts:** Warrant information, police identification, flashbang deployment, occupant perception, firearm handling, and synchronized entry and shooting timelines.

Mary Alice Love

- **Incident index title, not a verified court caption:** Fatal Mundelein police shooting in Illinois. (Public incident record)
- **Reported counsel and role:** Kevin W. O'Connor: Family-side attorney identified in the cited public record. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

Maverick Winston Lyon

- **Incident index title, not a verified court caption:** Shooting of Maverick Lyon.
- **Reported counsel:** Alicia LeDuc Montgomery, Stritmatter Law; Jesse Merrithew, Levi Merrithew Horst PC.
- **Investigation prompts:** Shooter identification, lines of fire, intervening objects, and attribution of each injury.

Michael Brown

- **Incident index title, not a verified court caption:** Shooting of Michael Brown.
- **Reported counsel:** Delia Addo-Yobo, Robert F. Kennedy Human Rights.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

- **Additional counsel and role:** Ben Crump: Family counsel identified in reporting on the 2015 wrongful-death lawsuit. (Representation record)
- **Additional counsel and role:** Anthony Gray: Family counsel identified in reporting on the 2015 wrongful-death lawsuit. (Representation record)
- **Additional counsel and role:** Daryl Parks: Family counsel identified in reporting on the 2015 wrongful-death lawsuit. (Representation record)

Michael Donnell Jones

- **Incident index title, not a verified court caption:** Fatal Akron police shooting during a U-Haul vehicle encounter in Ohio. (Public incident record)
- **Reported counsel and role:** Bobby DiCello, DiCello Levitt: Family-side attorney identified in the cited public record. (Public representation record)
- **Investigation prompts:** Vehicle movement, officer entry onto or into the vehicle, available escape paths, and the sequence of individual shots.

Michael Ramos

- **Verified proceeding title (shortened where noted):** Ramos v. City of Austin.
- **Reported counsel:** Rebecca Webber, Hendler Flores Law, PLLC; Scott M. Hendler, Hendler Flores Law, PLLC.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Miles Hall

- **Incident index title, not a verified court caption:** Shooting of Miles Hall.
- **Reported counsel:** John Burris, LAW OFFICES OF JOHN L. BURRIS.

- **Investigation prompts:** Information about the crisis, communication, containment, commands, and changes in the perceived threat.

Milton Hall

- **Verified proceeding title (shortened where noted):** Hall v. City of Saginaw.
- **Reported counsel:** Hugh M. Davis Jr.; Cynthia Heenan, Constitutional Litigation Associates; Debra A. Freid, Freid, Gallagher, Taylor & Associates, P.C..
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Modesto Reyes

- **Incident index title, not a verified court caption:** Shooting of Modesto Reyes.
- **Reported counsel:** Chris Murell, Murell Law Firm; Dedrick Moore, Law Office of Dedrick A. Moore.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Mohamed Bah

- **Verified proceeding title (shortened where noted):** Bah v. City of N.Y..
- **Reported counsel:** Abdul-Wali Abdullah Muhammad, Young and Bartlett, LLP; Mayo Gregory Bartlett, Young and Bartlett, LLP; Danielle Brittany Sullivan, Newman Ferrara LLP; Debra Sue Cohen, Newman Ferrara LLP; Jeffrey Michael Norton, Newman Ferrara LLP; Randolph M. McLaughlin, Newman Ferrara LLP; Franciscus A. Ladejola-Diaba, Sichenzia Ross Fernce Kesner LLP.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

SOURCES

1. **Lewis v. City of Edmond** https://www.courthousenews.com/wp-content/uploads/2022/09/isaiah-lewis-initial-complaint.pdf

2. **Aden v. City of Bloomington** https://unicornriot.ninja/wp-content/uploads/2020/12/Isak-Aden-Lawsuit-July-2-2020.pdf
3. **Matthew Lawlyes** https://www.startribune.com/family-of-somali-american-man-sues-over-his-shooting-death-by-police-in-eagan-in-2019/571622422/
4. **Searles v. City of Houston** https://caselaw.findlaw.com/court/us-5th-circuit/201526.html
5. **Shooting of Jamar Clark** https://www.startribune.com/after-judge-s-intervention-settlement-talks-resume-in-jamar-clark-lawsuit/509643702
6. **David Suro** https://www.mprnews.org/story/2019/08/09/attorneys-for-jamar-clark-family-members-confirm-agreement-on-200000-settlement
7. **Suro Law** https://surolaw.com/about/
8. **Shooting of James Boyd** https://www.koat.com/article/money-from-james-boyd-lawsuit-would-go-to-mentally-ill-family-says/5056400
9. **Walker v. City of Akron** https://www.businesswire.com/news/home/20230616098433/en/DiCello-Levitt-Eight-Akron-Police-Officers-Who-Killed-Jayland-Walker-Used-Excessive-Force-Police-Department-Has-Fostered-a-Culture-of-Violence-and-Racism-According-to-New-Federal-Lawsuit
10. **Shooting of Jesse Romero** https://www.latimes.com/local/lanow/la-me-ln-jesse-romero-lawsuit-20170623-story.html
11. **Humberto Guízar** https://thelalocal.org/public-safety/lawyer-releases-body-cam-video-of-jesse-romero-shooting/
12. **Law Offices of Humberto Guizar; historically also Guizar Henderson and Carrazco** https://www.courthousenews.com/lapd-wrongful-death-shooting-trial-closes/
13. **Shooting of Jimmy Atchison** https://www.wsbtv.com/news/local/atlanta/family-man-killed-by-atlanta-police-still-seeking-justice-20-months-later/YMXWB2ZKLJAP3A55TPYVT3LXMA/
14. **Tanya Miller** https://www.ajc.com/news/atlanta-news/lawyers-call-out-atlanta-city-hall-as-police-brutality-cases-linger/XBRTNQWC6VH6XBKWUWHCTJYSQQ/
15. **Shooting of John Crawford III** https://www.daytondailynews.com/news/crime--law/john-crawford-family-frustrated-civil-case-lagging/A9eitqe9y6OoenCXCLc1cI/
16. **Michael Wright** https://www.daytondailynews.com/news/crime--law/beavercreek-legal-bill-john-crawford-case-430k-and-rising/MjaGeck0sNa52irQhi13PI/
17. **Wright & Schulte LLC** https://yourlegalhelp.com/2020/12/27/wright-schulte-lawyers-to-help-lead-the-prosecution-of-claims-brought-by-the-family-of-andre-hill/
18. **Shooting of Jonathan Ferrell** https://www.charlotteobserver.com/news/local/crime/article20983929.html
19. **Maginnis Howard** https://www.carolinalaw.com/team/charles-monnett/
20. **Shooting of Jonathan Price** https://www.wfaa.com/article/news/local/former-wolfe-city-police-officer-shaun-lucas-not-guilty-murder-shooting-jonathan-price/287-9248bcd2-92e1-4a34-801b-165d794c3e71
21. **MERRITT LAW FIRM, LLC** https://www.scribd.com/document/378245631/Complaint-for-damages-filed-in-Yarber-case
22. **Shooting of Jordan Edwards** https://apnews.com/dd8f0effdfe14ab8a3646ec2c7a75b36
23. **Daryl Washington** https://apnews.com/article/shootings-police-us-news-ap-top-news-tx-state-wire-f5b68d24a1fd42c8a20077b40ba10406
24. **Shooting of Joseph Mann** https://www.cbsnews.com/sacramento/news/family-of-man-shot-by-sacramento-police-files-lawsuit/
25. **Shooting of Joshua Feast** https://www.houstonchronicle.com/news/houston-texas/crime/article/La-Marque-fatal-shooting-excessive-force-lawsuit-15806483.php
26. **Ben Crump** https://www.fox26houston.com/news/la-marque-police-release-body-cam-footage-from-shooting-of-joshua-feast
27. **Ben Crump Law** https://bencrump.com/about/attorneys/ben-crump/
28. **Shooting of Justine Ruszczyk Damond** https://www.mprnews.org/story/2018/09/14/ruszczyk-damond-noor-police-shooting-minneapolis-civil-suit
29. **Robins Kaplan LLP** https://www.robinskaplan.com/professionals/robert-bennett
30. **Shooting of Kajieme Powell** https://www.stltoday.com/news/local/crime-courts/kajieme-powells-mother-files-wrongful-death-suit-against-st-louis-police/article_87f99e85-b83f-5ebd-95e0-bfe19d5900fe.html
31. **The Legal Solution Group** https://molawyersmedia.com/2025/03/13/police-shooting-lawsuit-st-louis-18m-verdict/
32. **Shooting of Kawaski Trawick** https://www.propublica.org/article/what-police-impunity-looks-like-there-was-no-discipline-as-no-wrongdoing-was-found

33. **Shooting of Keita O'Neil** https://sfist.com/2023/02/10/da-will-indeed-drop-prosecution-of-keita-oneil-police-shooting-case-says-state-can-take-it-if-they-want/
34. **Brian Ford** https://missionlocal.org/2023/01/lawyers-cop-samayoa-keita-oneil-exculpatory/
35. **Shooting of Keith Lamont Scott** https://www.aclu.org/press-releases/aclu-calls-charlotte-police-release-video-footage-keith-lamont-scott-shooting
36. **Justin Bamberg** https://www.latimes.com/nation/la-na-police-shooting-lawyers-snap-story.html
37. **Bamberg Legal** https://bamberg-legal.com/media/
38. **Shooting of Kenneth Harding Jr.** https://oaklandnorth.net/2013/02/12/oscar-grant-family-reaches-out-to-mother-of-kenneth-harding/
39. **Shooting of Laquan McDonald** https://abc7chicago.com/post/attorneys-took-home-$18m-of-$5m-laquan-mcdonald-settlement/1131304/
40. **Shooting of Linden Cameron** https://en.wikipedia.org/wiki/Shooting_of_Linden_Cameron
41. **Shooting of Luis Gongora Pat** https://missionlocal.org/2016/06/family-of-homeless-man-shot-by-police-move-to-sue-san-francisco/
42. **Law Offices of John L. Burris** https://fr.scribd.com/document/326782336/Gongora-et-al-v-CCSF-et-al
43. **Adante Pointer** https://eltecolote.org/content/en/family-of-slain-homeless-man-files-lawsuit-against-city-officers/
44. **Lawyers For The People (Pointer & Buelna)** https://www.lawyersftp.com/about-us/
45. **Shooting of Ma'Khia Bryant** https://www.palmbeachdailynews.com/story/news/crime/2021/07/07/ohio-ag-sends-case-makhia-bryant-fatal-shooting-prosecutor/7885604002/
46. **The Martin Law Firm** https://www.wphm.net/2021/04/28/makhia-bryants-family-demands-answers-investigations-into-teenagers-death/
47. **Estate of Diaz v. City of Anaheim, No. 14-55644** https://law.justia.com/cases/federal/appellate-courts/ca9/14-55644/14-55644-2016-08-24.html
48. **Shooting of Mario Woods** https://abc7news.com/san-francisco-police-shooting-mario-woods-sfpd-tasers-with-bayview-district-caught-on-video/1119055/
49. **Adante Pointer** https://www.uclawsf.edu/2016/08/11/adante-pointer-03-fighting-for-justice-for-victims-of-fatal-police-shootings/
50. **Shooting of Maverick Lyon** https://www.stritmatter.com/albany-police-sued-for-shooting-hostage-five-times-after-he-escaped-captor/
51. **Shooting of Michael Brown** https://www.aclu-mo.org/cases/michael-brown-shooting-in-ferguson/
52. **Delia Addo-Yobo** https://thegrio.com/2024/08/09/advocates-remain-hopeful-about-justice-for-michael-brown-and-police-accountability/
53. **Ramos v. City of Austin** https://austin.widen.net/content/163l7mzkyz/pdf/Ramos-v.-COA.pdf
54. **Shooting of Miles Hall** https://www.kqed.org/news/11870955/contra-costa-da-clears-walnut-creek-officers-in-2019-miles-hall-killing/1000
55. **John Burris** https://www.cbsnews.com/sanfrancisco/news/walnut-creek-settles-family-police-shooting-victim-miles-hall/
56. **Hall v. City of Saginaw** https://milawyersweekly.com/news/2014/08/05/mentally-disturbed-man-shot-by-police/
57. **Constitutional Litigation Associates** https://nationalpoliceaccountability.org/our-team/
58. **Freid, Gallagher, Taylor & Associates, P.C.** https://www.freidgallaghertaylor.com/attorney/freid-debra/
59. **Shooting of Modesto Reyes** https://www.wdsu.com/article/attorneys-of-modesto-reyes-holds-news-conference-regarding-case/32945657
60. **Chris Murell** https://www.nola.com/news/crime_police/article_dfc92d3a-b561-11ea-9ff8-9f21b743e934.html
61. **Murell Law Firm** https://www.murell.law/
62. **Law Office of Dedrick A. Moore** https://lawofficeofdedrickamoore.com/
63. **Bah v. City of N.Y.** https://www.courtlistener.com/opinion/7330973/bah-v-city-of-ny/
64. **Incident record** https://www.kbzk.com/news/national/jacob-blakes-lawsuit-against-kenosha-police-officer-is-dismissed
65. **Public incident record** https://www.newsday.com/long-island/crime/nassau-county-lawsuit-xvyholtk
66. **Public incident record** https://abc7.com/post/jaque-rabon-death-family-man-killed-deputy-involved-shooting-riverside-files-federal-lawsuit/19729922/
67. **Public incident record** https://dicellolevitt.com/dicello-levitt-files-federal-civil-rights-lawsuit-against-mississippi-capitol-police-over-fatal-shooting-of-jaylen-lewis/

68. **Public incident record** https://www.latimes.com/california/story/2023-11-30/jesse-dominguez-chp-lawsuit
69. **Public incident record** https://www.mlive.com/news/ann-arbor/2026/10/watched-him-die-how-a-michigan-police-chase-ended-in-gunfire-and-a-dead-navy-veteran.html
70. **Incident record** https://www.connectionnewspapers.com/news/2015/feb/05/fairfax-county-goes-public-geer-documents/?template_preference=desktop
71. **Incident record** https://www.aclu-sdic.org/news/mother-slain-mexican-teen-sues-us-border-patrol-agents/
72. **Public incident record** https://johnsoncountypost.com/2026/08/20/chacon-lenexa-sues-city-police-officers-294452
73. **Public representation record** https://www.kcur.org/news/2025-10-10/johnson-county-attorney-wont-charge-lenexa-police-officers-in-fatal-shooting-of-missouri-man
74. **Incident record** https://tucson.com/news/blogs/police-beat/3-4m-settlement-in-deadly-2011-swat-raid-near-tucson/article_832b91ca-5b21-517d-bf8d-124008f63529.html
75. **Public incident record** https://www.spokesman.com/stories/2026/oct/14/spokanes-top-prosecutor-moves-to-reopen-investigat/
76. **Public incident record** https://people.com/ag-said-fatal-police-shooting-of-boy-1-was-justified-lawyer-says-evidence-tells-different-story-12188662
77. **Public incident record** https://alaskapublic.org/news/2024-08-14/family-of-man-killed-by-anchorage-police-files-wrongful-death-lawsuit
78. **Incident record** https://www.wsbtv.com/news/local/dekalb-county/forest-defenders-are-not-terrorists-family-protester-killed-training-facility-suing-gsp/QIUUWVAFNNETHNBW2PJSTKKUGU/
79. **Public incident record** https://news.wttw.com/2026/10/05/marimar-martinez-hopes-new-lawsuit-could-spur-criminal-charges-1-year-after-border
80. **Public representation record** https://www.courtlistener.com/docket/71561860/parties/united-states-v-martinez/
81. **Public incident record** https://wtaw.com/wp-content/uploads/2025/02/CityOfCSsued_PlaintiffsNewsRelease020725.pdf
82. **Public incident record** https://www.fox32chicago.com/news/mary-alice-love-mundelein-police-shooting
83. **Public representation record** https://www.lakemchenryscanner.com/2026/11/11/police-in-riot-gear-line-up-outside-mundelein-village-hall-as-protesters-demand-firing-of-sergeant-who-fatally-shot-armed-woman/
84. **Representation record** https://wreg.com/news/michael-browns-family-files-civil-lawsuit/
85. **Public incident record** https://dicellolevitt.com/dicello-levitt-files-10-million-federal-civil-rights-lawsuit-over-fatal-akron-police-shooting-of-michael-jones/

CHAPTER 46

Case and counsel index: N to R

Nicholas Thorn

- **Incident index title, not a verified court caption:** Shooting of Nicholas Thorn.
- **Reported counsel:** Travis Mayor, Mayor Law, LLC; Lance Brooks, Mayor Law, LLC.
- **Investigation prompts:** Object identification, visibility, dispatch information, and the timing of commands and gunfire.

Nicolas Chavez

- **Verified proceeding title (shortened where noted):** Chavez v. Alvarado.
- **Reported counsel:** Roberto Omar Cantu, Roberts Markland LLP; Sean Alan Roberts, Roberts Markland LLP.
- **Investigation prompts:** Information about the crisis, communication, containment, commands, and changes in the perceived threat.

Oscar Grant

- **Incident index title, not a verified court caption:** Shooting of Oscar Grant.
- **Reported counsel:** John Burris, LAW OFFICES OF JOHN L. BURRIS.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Patrick Lyoya

- **Incident index title, not a verified court caption:** Shooting of Patrick Lyoya.
- **Reported counsel:** Ben Crump, Ben Crump Law.

- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Paul O'Neal

- **Incident index title, not a verified court caption:** Shooting of Paul O'Neal.
- **Reported counsel:** Michael Oppenheimer.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Philando Castile

- **Incident index title, not a verified court caption:** Shooting of Philando Castile.
- **Reported counsel:** Robert Bennett, Robins Kaplan LLP; Glenda Hatchett, Stewart Miller Simmons Trial Attorneys.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Pierre Loury

- **Verified proceeding title (shortened where noted):** Estate of Pierre Loury v. City of Chicago.
- **Counsel identification:** No individual attorney was verified in the reviewed materials.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Porter Burks

- **Incident index title, not a verified court caption:** Fatal Detroit police shooting in Michigan. (Public incident record)
- **Reported counsel and role:** Geoffrey Fieger: Attorney identified in the family's historical wrongful-death filing. (Public representation record)

- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

Quinton Baker and Kentre Baker

- **Incident index title, not a verified court caption:** Police shooting and disputed attribution of a child's fatal wounds during a Las Vegas hostage incident. (Public incident record)
- **Reported counsel and role:** Ofelia Markarian: Attorney for the child's family, including mother Raneka Pate; not identified as counsel for Quinton Baker's estate. (Public representation record)
- **Investigation prompts:** Separate each shooter's discharges, bullet paths, intended targets, hostage positions, and the medical attribution of each wound.

Quintonio LeGrier and Bettie Jones

- **Incident index title, not a verified court caption:** Shooting of Quintonio LeGrier and Bettie Jones.
- **Reported counsel:** Basileios Foutris, Foutris Law Office, Ltd..
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.
- **Additional counsel and role:** Larry Rogers Jr.: Attorney for the Estate of Bettie Jones, not the LeGrier estate. (Representation record)

Rajon Belt-Stubblefield

- **Incident index title, not a verified court caption:** Fatal Aurora police shooting in Colorado. (Public incident record)
- **Reported counsel and role:** Milo Schwab: Family-side attorney identified in the cited public record. (Public representation record)
- **Reported counsel and role:** Ben Crump: Family-side attorney identified in the cited public record. (Public representation record)

- **Reported counsel and role:** Harry Daniels: Family-side attorney identified in the cited public record. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

Ramarley Graham

- **Incident index title, not a verified court caption:** Shooting of Ramarley Graham.
- **Counsel identification:** No individual attorney was verified in the reviewed materials.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Randall Adjessom

- **Incident index title, not a verified court caption:** Fatal police shooting during a residential raid in Mobile, Alabama. (Public incident record)
- **Reported counsel and role:** Elizabeth Bailey: Attorney for Akouvi Adjessom, Randall's mother, identified in the report. (Public representation record)
- **Investigation prompts:** Warrant information, police identification, entry timing, occupant perception, weapon movement, and individual shots.

Randy Martin

- **Incident index title, not a verified court caption:** Fatal Galveston police shooting in Texas. (Public incident record)
- **Reported counsel and role:** Adalberto Ruiz: Family attorney pursuing access to shooting recordings. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

- **Record scope:** The cited representation concerns evidence access and consideration of a civil suit, not a verified civil complaint. (Houston Public Media)

Rayshard Brooks

- **Incident index title, not a verified court caption:** Shooting of Rayshard Brooks.
- **Reported counsel:** L. Chris Stewart, Stewart Miller Simmons Trial Attorneys; Justin Miller, Stewart Miller Simmons Trial Attorneys.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Rekia Boyd

- **International petition:** Rekia Boyd et al. v. United States of America.
- **Counsel identification:** No individual attorney was verified in the reviewed materials.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Renee Good

- **Incident index title, not a verified court caption:** Fatal ICE shooting during a vehicle encounter in Minneapolis. (Incident record)
- **Reported counsel:** Antonio Romanucci, Romanucci & Blandin: Attorney identified in reporting on the family and partner's October 2026 lawsuits. (Representation record)
- **Reported counsel:** Benjamin Berkman: Attorney identified in reporting on the family and partner's October 2026 lawsuits. (Representation record)
- **Investigation prompts:** Vehicle motion, officer position, synchronized recordings, shot sequence, and the legal status of each defendant.

- **Record scope:** MPR reported two filed civil lawsuits on October 1, 2026. The complaints contain allegations; the report does not establish liability or an available expert assignment. (MPR News)
- **Reported counsel and role:** Daisy Ayllon, Romanucci & Blandin: Family and partner's counsel; the firm uses the spelling Daisy Ayllón. (Public representation record)
- **Reported counsel and role:** Sarah M. Raisch, Romanucci & Blandin: Counsel for the family and partner. (Public representation record)
- **Reported counsel and role:** Stephen H. Weil, Romanucci & Blandin: Counsel for the family and partner. (Public representation record)
- **Reported counsel and role:** Kevin Riach, Riach Law: Co-counsel for the family and partner. (Public representation record)

Ricardo Munoz

- **Incident index title, not a verified court caption:** Shooting of Ricardo Muñoz.
- **Reported counsel:** Daisy Ayllon, Romanucci & Blandin; Michael Perna, Perna & Abracht, LLC.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Ricky Cobb II

- **Incident index title, not a verified court caption:** Shooting of Ricky Cobb II.
- **Reported counsel:** Bakari Sellers, Strom Law Firm, L.L.C.; Harry Daniels, Law Offices of Harry M. Daniels; F. Clayton Tyler, F. Clayton Tyler, P.A..
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Roger Fortson

- **Incident index title, not a verified court caption:** Shooting of Roger Fortson.
- **Reported counsel:** Ben Crump, Ben Crump Law.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Ronald Johnson III

- **Verified proceeding title (shortened where noted):** Holmes v. Hernandez.
- **Counsel identification:** No individual attorney was verified in the reviewed materials.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Ronald Madison and James Brissette

- **Incident index title, not a verified court caption:** Shooting of Ronald Madison and James Brissette.
- **Reported counsel:** Mary Howell.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Ronell Foster

- **Verified proceeding title (shortened where noted):** Foster v. Vallejo.
- **Counsel identification:** No individual attorney was verified in the reviewed materials.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Ruby Ridge: Vicki and Samuel Weaver

- **Incident index title, not a verified court caption:** Shootings during the 1992 federal operation at Ruby Ridge, Idaho. (Incident record)
- **Reported counsel:** Gerry Spence: Randy Weaver's attorney identified in contemporaneous settlement reporting; historical reference only. (Representation record)
- **Investigation prompts:** Separate shooting events, individual actors, rules of engagement, visibility, target identification, and wound attribution.
- **Record scope:** The Justice Department announced a settlement of the Weaver family's claims in August 1995 without admitting wrongdoing or legal liability. Keep the shooting of Samuel Weaver separate from the later shooting of Vicki Weaver. (Justice Department settlement announcement)

Ryan Gainer

- **Incident index title, not a verified court caption:** Shooting of Ryan Gainer.
- **Reported counsel:** DeWitt Lacy, Burris Nisenbaum Curry & Lacy.
- **Investigation prompts:** Information about the crisis, communication, containment, commands, and changes in the perceived threat.

Ryan Stokes

- **Verified proceeding title (shortened where noted):** N.S. v. Kansas City Board of Police Commissioners.
- **Reported counsel:** Raymond P. Tolentino, Howard University School of Law Civil Rights Clinic; Edward Williams, Howard University School of Law Civil Rights Clinic; Brian F. McCallister, The McCallister Law Firm, P.C.; Andrew D. Ferrell, The McCallister Law Firm, P.C.; Cynthia L. Short, CLS Mitigation & Consulting Services, L.L.C..
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

SOURCES

1. **Shooting of Nicholas Thorn** https://www.oregonlive.com/crime/2026/10/portland-police-sued-for-shooting-killing-man-who-pointed-pellet-gun-not-real-rifle-at-officers.html
2. **Mayor Law, LLC** https://www.mayorlaw.com/about-travis-mayor/
3. **Mayor Law, LLC** https://www.mayorlaw.com/
4. **Chavez v. Alvarado** https://case-law.vlex.com/vid/chavez-v-alvarado-civil-906157400
5. **Shooting of Oscar Grant** https://www.rlslawyers.com/rlss-mike-rains-successfully-defends-johannes-mehserle-in-civil-rights-trial/
6. **John Burris** https://www.nbcbayarea.com/news/local/san-francisco-federal-appeals-court-clears-ways-for/2071731/
7. **LAW OFFICES OF JOHN L. BURRIS** https://www.scribd.com/document/378245631/Complaint-for-damages-filed-in-Yarber-case
8. **Shooting of Patrick Lyoya** https://www.mlive.com/news/grand-rapids/2025/05/deadlocked-jury-overwhelmingly-favored-acquitting-christopher-schurr-attorney-says.html
9. **Ben Crump Law** https://bencrump.com/about/attorneys/ben-crump/
10. **Shooting of Paul O'Neal** https://www.chicagotribune.com/2016/08/26/suit-accuses-chicago-police-of-rule-violations-in-paul-oneal-shooting/
11. **Michael Oppenheimer** https://www.npr.org/2016/08/11/489661954/gangs-allegedly-threaten-chicago-police-after-shooting-of-black-man
12. **Shooting of Philando Castile** https://www.twincities.com/2017/06/26/philando-castile-family-reaches-3m-settlement-in-death/
13. **Robert Bennett** https://minnlawyer.com/2017/06/29/in-philando-castile-case-familiar-adversaries-forged-swift-deal/
14. **Robins Kaplan LLP** https://www.robinskaplan.com/professionals/robert-bennett
15. **Stewart Miller Simmons Trial Attorneys** https://thegrio.com/2026/03/06/judge-glenda-hatchett-new-childrens-book/
16. **Estate of Pierre Loury v. City of Chicago** https://www.casemine.com/judgement/us/603d21014653d05897279298?target=amp_references
17. **Shooting of Quintonio LeGrier and Bettie Jones** https://www.dispatch.com/story/news/2018/06/27/jury-quintonio-legrier-chicago-police-1-million/740460002/
18. **Foutris Law Office, Ltd.** https://attorneys.lexinter.net/lawyers/basileios-bill-j-foutris
19. **Shooting of Ramarley Graham** https://www.seacoastonline.com/story/news/2017/02/02/rally-mark-anniversary-nyc-fatal-police-involved-shooting/97383080/
20. **Shooting of Rayshard Brooks** https://www.law.com/dailyreportonline/2020/06/18/defense-lawyers-counter-prosecutors-narrative-of-rayshard-brooks-death/
21. **L. Chris Stewart** https://www.ajc.com/news/atlanta-news/atlanta-lawyers-seek-civil-trial-against-officers-that-killed-rayshard-brooks/JLU6ODYWZBBX7LGUVHNY2RI2IA/
22. **Stewart Miller Simmons Trial Attorneys** https://provenverdicts.com/stewart-miller-simmons-trial-attorneys/proven-verdicts/walter-scott-north-charleston-6-5-million-settlement
23. **Stewart Miller Simmons Trial Attorneys** https://smstrial.com/attorneys/justin-miller/
24. **Rekia Boyd et al. v. United States of America** https://kennedyhumanrights.org/litigation/rekia-boyd-v-united-states-challenging-impunity-for-police-killings/
25. **Shooting of Ricardo Muñoz** https://pa4law.com/munoz-case/
26. **Daisy Ayllon** https://lancasteronline.com/news/local/attorneys-wrangle-over-evidence-confidentiality-in-ricardo-mu-oz-wrongful-death-suit/article_0557746c-7fb4-11ec-a44f-ff050ff0a7ec.html
27. **Romanucci & Blandin** https://lawyers.law.cornell.edu/lawyer/daisy-ayllon-1500772
28. **Shooting of Ricky Cobb II** https://www.mprnews.org/episode/2024/01/25/criminal-lawyer-weighs-in-on-charges-against-state-trooper-in-fatal-shooting-of-ricky-cobb-ii
29. **Bakari Sellers** https://www.startribune.com/ricky-cobb-ii-family-killed-by-minnesota-trooper-hires-civil-rights-attorneys/600297128
30. **Strom Law Firm, L.L.C.** https://stromlaw.com/bakari-sellers/
31. **Law Offices of Harry M. Daniels** https://www.wunc.org/news/2022-07-19/lawyers-in-andrew-brown-jr-case-seeking-1-2-million-in-fees
32. **F. Clayton Tyler, P.A.** https://fctyler.com/our-firm/

33. **Shooting of Roger Fortson** https://bencrump.com/attorney-ben-crump-files-lawsuit-on-behalf-of-family-of-airman-roger-fortson-fatally-shot-by-okaloosa-county-deputy-in-his-own-home/
34. **Holmes v. Hernandez** http://i2.cdn.turner.com/cnn/2015/images/12/02/dorothy.holmes.v.officer.george.hernandez.and.the.city.of.chicago.-.pacer.106.-.3rd.amended.complaint.pdf
35. **Shooting of Ronald Madison and James Brissette** https://www.nola.com/news/ending-decade-long-danziger-bridge-case-federal-judge-accepts-guilty-pleas-from-5-ex-nopd/article_60f6b8ad-a238-573c-a9eb-7b27aa40b21b.html
36. **Foster v. Vallejo** https://www.lawyersftp.com/case-result/
37. **Shooting of Ryan Gainer** https://www.vvdailypress.com/story/news/crime/2026/10/29/san-bernardino-county-da-rules-autistic-apple-valley-teen-ryan-gainer-justified/92498232007/
38. **DeWitt Lacy** https://www.einpresswire.com/article/726848419/bncl-announces-federal-lawsuit-over-police-shooting-of-autistic-teen-ryan-gainer
39. **N.S. v. Kansas City Board of Police Commissioners** https://www.supremecourt.gov/DocketPDF/22/22-556/242191/20220930140812931_Stokes%20Cert%20Application%20for%20Extension.pdf
40. **Public incident record** https://www.wnem.com/2022/11/01/family-man-slain-by-detroit-police-files-50m-lawsuit/
41. **Public incident record** https://www.fox5vegas.com/2026/02/27/live-family-child-killed-hostage-situation-hold-press-conference/
42. **Representation record** https://abc7chicago.com/quintonio-legrier-shooting-bettie-jones-lawsuit/3185111/
43. **Public incident record** https://bencrump.com/press/aurora-police-shooting-lawsuit/
44. **Public incident record** https://www.al.com/news/2026/10/bodycam-shows-alabama-police-yell-hands-up-after-fatally-shooting-16-year-old-in-marijuana-raid.html
45. **Public incident record** https://www.houstonpublicmedia.org/articles/news/local/galveston/2026/09/09/561380/grand-jury-takes-no-action-against-galveston-police-officer-in-fatal-traffic-stop-shooting/
46. **Incident record** https://www.mprnews.org/story/2026/10/01/renee-good-lawsuit-minneapolis-ice-shooting-operation-metro-surge
47. **Public representation record** https://www.rblaw.net/pressrelease-civil-lawsuits-united-states-individual-federal-agents-officials-death-renee-good
48. **Incident record** https://www.justice.gov/archive/opa/pr/Pre_96/August95/444.txt.html
49. **Representation record** https://scholar.lib.vt.edu/VA-news/ROA-Times/issues/1995/rt9508/950816/08160096.htm

CHAPTER 47

Case and counsel index: S to Z

Saheed Vassell

- **Incident index title, not a verified court caption:** Shooting of Saheed Vassell.
- **Reported counsel:** Robinson Iglesias; Michael Hueston, Michael Hueston, Esq; Richard Cardinale, Law Office of Richard Cardinale.
- **Investigation prompts:** Information about the crisis, communication, containment, commands, and changes in the perceived threat.

Salaythis Melvin

- **Verified proceeding title (shortened where noted):** Michelin D. McKee v. James Montiel.
- **Reported counsel:** Bradley Laurent, Law Office of Haynes & Laurent (historical representation only); Carlus Haynes, Law Offices of Haynes & Laurent, P.A..
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Samuel Christopher

- **Incident index title, not a verified court caption:** Nonfatal road-rage shooting involving an off-duty Fort Worth police officer in Texas. (Public incident record)
- **Reported counsel and role:** Stephen Kotara: Attorney for Samuel and Mykaela Christopher. (Public representation record)
- **Investigation prompts:** The officer's duty status, the basis for any asserted state action, vehicle movements, witness accounts, and the discharge sequence.

Samuel DuBose

- **Incident index title, not a verified court caption:** Shooting of Sam DuBose.
- **Reported counsel:** Mark O'Mara, O'Mara Law Group; Al Gerhardstein, FG+G; Michael Wright, Wright & Schulte LLC.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Sean Bell

- **Incident index title, not a verified court caption:** Shooting of Sean Bell.
- **Reported counsel:** Sanford Rubenstein, Rubenstein and Rynecki.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Sean Monterrosa

- **Incident index title, not a verified court caption:** Shooting of Sean Monterrosa.
- **Reported counsel:** John J. Coyle, McEldrew Purtell; Lee Merritt, MERRITT LAW FIRM, LLC.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Sean Moore

- **Incident index title, not a verified court caption:** Shooting of Sean Moore.
- **Reported counsel:** Adante Pointer, Lawyers For The People (Pointer & Buelna).
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Sergio Adrián Hernández Güereca

- **Incident index title, not a verified court caption:** Cross-border shooting involving a U.S. Border Patrol agent in Texas and a teenager in Mexico. (Incident record)
- **Reported counsel:** Robert C. Hilliard: Family-side attorney identified in the 2015 Supreme Court review announcement. (Representation record)
- **Reported counsel:** Stephen I. Vladeck: Petitioners' counsel of record in Supreme Court docket 17-1678. (Representation record)
- **Investigation prompts:** Shooter and decedent locations, border geometry, ballistic evidence, and the availability of the particular federal remedy.
- **Record scope:** In Hernández v. Mesa, the Supreme Court declined to extend Bivens to the cross-border shooting claim. The remedy ruling is not a finding that the gunfire was justified. (Supreme Court opinion, February 25, 2020)

Shawn Gagne

- **Incident index title, not a verified court caption:** Fatal Mesa police shooting in Arizona. (Public incident record)
- **Reported counsel and role:** Zachary E. Mushkatel, Mushkatel, Robbins & Becker, P.L.L.C.: Attorney for Christopher and Suzette Gagne, the decedent's parents. (Public representation record)
- **Reported counsel and role:** Jordan A. Brunner, Mushkatel, Robbins & Becker, P.L.L.C.: Attorney for Christopher and Suzette Gagne, the decedent's parents. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

Sherman Lee Butler

- **Incident index title, not a verified court caption:** Fatal shooting by a court bailiff during an eviction in Detroit, Michigan. (Public incident record)

- **Reported counsel and role:** Maurice Davis: Family-side attorney identified in the cited public record. (Public representation record)
- **Reported counsel and role:** Dionne Webster-Cox: Family-side attorney identified in the cited public record. (Public representation record)
- **Investigation prompts:** The bailiff's legal authority, each participant's actions, weapon access, officer positions, recording evidence, and the use of force during the eviction.
- **Record scope:** The reported shooter was a court bailiff, not an identified Detroit police officer. Establish the actor's legal status and duties before selecting defendants or claims. (WXYZ)

Silverio Villegas González

- **Incident index title, not a verified court caption:** Fatal ICE shooting in Franklin Park, Illinois. (Public incident record)
- **Reported counsel and role:** Jonathan Manes, MacArthur Justice Center: Attorney identified as filing the family's legal claim. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.
- **Record scope:** The cited report distinguishes the family's administrative legal claim from a filed lawsuit. Do not treat the two proceedings as interchangeable. (The Washington Post)

Sincere Pierce and Angelo Crooms

- **Incident index title, not a verified court caption:** Shooting of Sincere Pierce and Angelo Crooms.
- **Reported counsel:** Ben Crump, Ben Crump Law; Natalie Jackson.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Sonya Massey

- **Incident index title, not a verified court caption:** Shooting of Sonya Massey.
- **Reported counsel:** Ben Crump, Ben Crump Law; Antonio Romanucci, Romanucci & Blandin.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Stephon Clark

- **Incident index title, not a verified court caption:** Shooting of Stephon Clark.
- **Reported counsel:** Brian Panish, Panish | Shea | Ravipudi LLP; Dale K. Galipo, The Law Offices of Dale K. Galipo; Eric Valenzuela, The Law Offices of Dale K. Galipo; Ben Crump, Ben Crump Law.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Steven Taylor

- **Incident index title, not a verified court caption:** Shooting of Steven Taylor.
- **Reported counsel:** Ben Crump, Ben Crump Law.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Ta'Kiya Young

- **Incident index title, not a verified court caption:** Shooting of Ta’Kiya Young.
- **Reported counsel:** Sean Walton, Walton + Brown, LLP; Anthony Pierson, Pierson and Pierson LLC.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Tamir Rice

- **Incident index title, not a verified court caption:** Shooting of Tamir Rice.
- **Reported counsel:** Subodh Chandra, The Chandra Law Firm LLC.
- **Investigation prompts:** Object identification, visibility, dispatch information, and the timing of commands and gunfire.
- **Additional counsel and role:** Ben Crump: Former family counsel; later counsel for Leonard Warner, with intended withdrawal reported in October 2015. (Representation record)
- **Additional counsel and role:** Daryl Parks: Former family counsel; later counsel for Leonard Warner, with intended withdrawal reported in October 2015. (Representation record)
- **Additional counsel and role:** Walter Madison: Former family counsel; later counsel for Leonard Warner, with intended withdrawal reported in October 2015. (Representation record)
- **Additional counsel and role:** Jonathan Abady: Replacement family-side counsel identified in October 2015 reporting. (Representation record)

Terence Crutcher

- **Verified proceeding title (shortened where noted):** Manning v. City of Tulsa.
- **Reported counsel:** Karin S. Portlock, Gibson Dunn & Crutcher LLP; Lee R. Crain, Gibson Dunn & Crutcher LLP; Aiyanna Isom, Gibson Dunn & Crutcher LLP; Julia T. Ross, Gibson Dunn & Crutcher LLP; Mary Otoo, Gibson Dunn & Crutcher LLP; Claire V. Madill, Gibson Dunn & Crutcher LLP; Damario Solomon-Simmons, Solomon Simmons Law.
- **Investigation prompts:** The approach or entry, identification of officers and occupants, weapon visibility, and the firing sequence.

Timothy Cook

- **Incident index title, not a verified court caption:** Fatal Memphis police shooting during a vehicle encounter in Tennessee. (Public incident record)
- **Reported counsel and role:** Michael Gallagher: Attorney identified as participating in the family's civil filing. (Public representation record)
- **Investigation prompts:** Vehicle path, officer location, alleged contact with the vehicle, shot direction, and the order of individual discharges.

Timothy Russell and Malissa Williams

- **Incident index title, not a verified court caption:** Shooting of Timothy Russell and Malissa Williams.
- **Reported counsel:** Terry Gilbert; David Malik, Malik Law.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Tony Robinson

- **Incident index title, not a verified court caption:** Fatal police shooting in Madison, Wisconsin. (Incident record)
- **Reported counsel:** Anand Swaminathan: Attorney identified in reporting on the Robinson estate's civil case and settlement. (Representation record)
- **Reported counsel:** David Owens: Attorney identified in reporting on the Robinson estate's civil case and settlement. (Representation record)
- **Investigation prompts:** Entry, stairway geometry, officer and decedent movements, physical evidence, and the firing sequence.
- **Record scope:** The report describes a civil settlement and distinguishes the decision not to bring criminal charges. A settlement does not establish an adjudicated finding of wrongful force. (The Capital Times)

Tyre King

- **Incident index title, not a verified court caption:** Shooting of Tyre King.
- **Reported counsel:** Chanda L. Brown, Walton + Brown, LLP; Sean Walton, Walton + Brown, LLP.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Tyrell Wilson

- **Incident index title, not a verified court caption:** Shooting of Tyrell Wilson.
- **Reported counsel:** John Burris, LAW OFFICES OF JOHN L. BURRIS.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Tyrie Howse

- **Incident index title, not a verified court caption:** Fatal police shooting in Stockbridge, Georgia. (Public incident record)
- **Reported counsel and role:** Harry Daniels: Family-side attorney identified in the cited public record. (Public representation record)
- **Reported counsel and role:** Gerald Griggs: Family-side attorney identified in the cited public record. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

Tyrin Johnson

- **Incident index title, not a verified court caption:** Shooting of Tyrin Johnson, Memphis, Tennessee, July 5, 2026. (Local Memphis, November 2, 2026)

- **Reported family counsel:** André C. Wharton, The Wharton Law Firm. (Local Memphis; Shelby County Election Commission biography)

Two Tennessee National Guard members fired at Johnson during a pursuit involving Memphis police. (Local Memphis) The Shelby County District Attorney's Office stated that Johnson died from a gunshot wound that entered his back and exited through his chest. (Local Memphis) CBS/AP reported that Johnson was 20 years old and had been armed. (CBS/AP, November 3, 2026)

The accounts require careful comparison. A National Guard report obtained by the Associated Press stated that Johnson turned toward the guard members and pointed a handgun at them; the report stated that both guard members fired M17 handguns. (CBS/AP) The reported back-entry wound raises a reconstruction question, but wound location alone does not establish Johnson's orientation, movement, or weapon position when each guard member fired. Compare the original autopsy, wound track, scene geometry, cartridge cases, firearm examinations, synchronized recordings, and witness accounts before drawing a conclusion about the shooting.

Prosecutors released police body-camera, stationary-camera, and bystander footage on November 2, 2026. (Local Memphis; CBS/AP) Wharton stated that the released footage did not show the full sequence, including the moments immediately before the fatal shot. (Local Memphis) CBS/AP likewise reported that the footage did not show the initial encounter or the guard members firing at Johnson. (CBS/AP) CBS/AP described footage of a guard member moving a handgun on the ground, a police officer directing the guard member to leave the handgun alone, an ambulance request, and a guard member beginning to cut Johnson's shirt. (CBS/AP)

- **Firearm discharge and reconstruction:** Establish each shooter's location, sight line, weapon, discharge sequence, and opportunity to perceive Johnson's movements. Distinguish recorded sounds from visually documented shots.

- **National Guard training and authority:** Obtain deployment orders, duty status, command assignments, firearms qualifications, use-of-force instructions, and training for civilian law-enforcement support. Counsel should establish the legal status of each actor before selecting claims or defendants.
- **Scene and recording evidence:** Preserve native recordings and metadata. Document who moved the handgun, the handgun's original position, and the handling and collection of physical evidence.
- **Emergency response:** Reconstruct the interval from gunfire to aid, available medical equipment, personnel training, dispatch communications, ambulance arrival, and treatment. Qualified medical analysis must address any claimed consequence of a delay.
- **Procedural limit:** The November 3 report described an ongoing Tennessee Bureau of Investigation inquiry and no charging decision at that time. (CBS/AP) The cited reports do not identify a filed civil complaint, a civil case number, or a named civil defendant. Confirm the docket and current representation before treating the matter as filed litigation.

Valentina Orellana Peralta

- **Verified proceeding title (shortened where noted):** Estate of Valentina Orellana Peralta v. City of Los Angeles.
- **Reported counsel:** Rahul Ravipudi, PANISH | SHEA | BOYLE | RAVIPUDI; Paul Traina, PANISH | SHEA | BOYLE | RAVIPUDI; Erika Contreras, PANISH | SHEA | BOYLE | RAVIPUDI; John W. Shaller, PANISH | SHEA | BOYLE | RAVIPUDI; Nick Rowley, Trial Lawyers for Justice; Haytham Faraj, The Law Offices of Haytham Faraj (Faraj Law); Henry Peacor, Trial Lawyers for Justice.
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Victor Altamirano

- **Incident index title, not a verified court caption:** Fatal Phoenix police shooting during a mental-health emergency in Arizona. (Public incident record)

- **Reported counsel and role:** Richard Lyons, Kelly & Lyons: Family-side attorney identified in the cited public record. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

Victor Perez

- **Incident index title, not a verified court caption:** Fatal Pocatello police shooting in Idaho. (Public incident record)
- **Reported counsel and role:** James Cook, Burris, Nisenbaum, Curry & Lacy: Family-side attorney identified in the cited public record. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

Vonderrit Myers Jr

- **Incident index title, not a verified court caption:** Shooting of VonDerrit Myers Jr..
- **Counsel identification:** No individual attorney was verified in the reviewed materials.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Walter Scott

- **Incident index title, not a verified court caption:** Shooting of Walter Scott.
- **Reported counsel:** L. Chris Stewart, Stewart Miller Simmons Trial Attorneys.
- **Investigation prompts:** Native recordings, witness positions, firearm handling, shot sequence, physical evidence, and medical response.

Waymon Gates

- **Incident index title, not a verified court caption:** Historical fatal police shooting in Dwight, Illinois; the underlying incident in Gates v. Montalbano. (Public incident record)
- **Reported counsel and role:** Janette C. Wilson: Historical counsel for Douglas Gates as administrator of Waymon Gates's estate. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.
- **Record scope:** The cited opinion identifies a historical Illinois case, not a recent incident involving the Gates, New York, police department. (District-court opinion)

Willie McCoy

- **Incident index title, not a verified court caption:** Shooting of Willie McCoy.
- **Reported counsel:** Melissa Nold, Law Offices of John L. Burris; Adante Pointer, Lawyers For The People (Pointer & Buelna).
- **Investigation prompts:** Vehicle movement, officer position, available sight lines, and the sequence of individual shots.

Zadarious Dorsey

- **Incident index title, not a verified court caption:** Fatal Newnan police shooting in Georgia. (Public incident record)
- **Reported counsel and role:** Harry Daniels: Attorney identified as representing Dorsey's family. (Public representation record)
- **Investigation prompts:** Native recordings, officer and claimant positions, weapon identification, commands, shot sequence, physical evidence, and medical response.

SOURCES

1. **Shooting of Saheed Vassell** https://www.amny.com/news/crown-heights-shooting-saheed-vassell-1-18894016/
2. **Michael Hueston, Esq** https://profiles.superlawyers.com/new-york/brooklyn/lawyer/michael-oliver-hueston/4b927546-ca0c-4904-aa4a-ca55816261fd.html

3. **Law Office of Richard Cardinale** https://www.richardcardinalelaw.com/
4. **Michelin D. McKee v. James Montiel** https://law.justia.com/cases/federal/appellate-courts/ca11/24-11828/24-11828-2025-05-08.html
5. **Bradley Laurent** https://www.clickorlando.com/news/local/2020/08/19/make-them-think-twice-family-of-man-killed-by-orange-county-deputy-demands-policy-changes
6. **Law Office of Haynes & Laurent** https://www.avvo.com/attorneys/32819-fl-bradley-laurent-1229913.html
7. **Law Offices of Haynes & Laurent, P.A.** https://www.bbb.org/us/fl/orlando/profile/criminal-lawyer/law-offices-of-haynes-laurent-pa-0733-35738541
8. **Shooting of Sam DuBose** https://www.seacoastonline.com/story/news/2016/01/18/uc-sam-dubose-family-reach-settlement/78957824/
9. **O'Mara Law Group** https://profiles.superlawyers.com/florida/orlando/lawyer/mark-m-omara/0f99943f-e3ee-41e9-be03-b065cd662c14.html
10. **FG+G** https://www.fggfirm.com/al-gerhardstein
11. **Wright & Schulte LLC** https://yourlegalhelp.com/2020/12/27/wright-schulte-lawyers-to-help-lead-the-prosecution-of-claims-brought-by-the-family-of-andre-hill/
12. **Shooting of Sean Bell** https://www.rubensteinandrynecki.com/blog/2013/01/sanford-rubenstein-esq-a-fighter-for-awards-for/
13. **Shooting of Sean Monterrosa** https://mceldrewpurtell.com/news/monterrosa-family-confirms-settlement/
14. **MERRITT LAW FIRM, LLC** https://www.scribd.com/document/378245631/Complaint-for-damages-filed-in-Yarber-case
15. **Shooting of Sean Moore** https://missionlocal.org/2020/02/police-shooting-victim-sean-moores-federal-civil-rights-case-vs-san-francisco-will-continue-even-after-his-death/
16. **Lawyers For The People (Pointer & Buelna)** https://www.lawyersftp.com/about-us/
17. **Shooting of Sincere Pierce and Angelo Crooms** https://www.clickorlando.com/news/local/2021/04/23/attorneys-for-families-of-teens-shot-killed-by-brevard-deputy-seek-doj-investigation/
18. **Ben Crump Law** https://bencrump.com/about/attorneys/ben-crump/
19. **Shooting of Sonya Massey** https://capitolnewsillinois.com/news/massey-attorneys-announce-10-million-settlement-in-wrongful-death-case/
20. **Romanucci & Blandin** https://lawyers.law.cornell.edu/lawyer/antonio-m-romanucci-357167
21. **Shooting of Stephon Clark** https://www.panish.law/2019/01/family-of-stephon-clark-files-wrongful-death-lawsuit-against-sacramento-officers-city-for-fatal-shooting/
22. **The Law Offices of Dale K. Galipo** https://www.galipolaw.com/
23. **Shooting of Steven Taylor** https://www.sfchronicle.com/bayarea/article/Family-of-mentally-ill-man-shot-in-a-Walmart-by-17092109.php
24. **Shooting of Ta'Kiya Young** https://apnews.com/article/ohio-police-shooting-murder-shoplifting-5aeeaeff40fbad5dd85da1a77767bce6
25. **Sean Walton** https://attorneymichaelwright.com/wrongful-death-lawsuit-filed-on-behalf-of-takiya-young/
26. **Walton + Brown, LLP** https://waltonbrownlaw.com/article/202/family-of-casey-goodson-jr-reaches-historic-7-million-settlement-with-franklin-county
27. **Pierson and Pierson LLC** https://piersonpierson.com/about-us/
28. **Shooting of Tamir Rice** https://www.commondreams.org/news/2016/04/25/no-such-thing-closure-tamir-rices-family-settles-6m-cleveland
29. **Subodh Chandra** https://whistleblower.org/in-the-news/the-washington-post-justice-dept-quietly-curtailed-civil-rights-investigation-into-tamir-rice-killing/
30. **The Chandra Law Firm LLC** https://www.chandralaw.com/about/meet-the-team/subodh-chandra
31. **Manning v. City of Tulsa** https://www.law360.com/articles/2460151
32. **Shooting of Timothy Russell and Malissa Williams** https://www.reuters.com/article/world/uk/cleveland-settles-police-chase-shooting-for-3-million-idUSKCN0J22O6/
33. **Terry Gilbert** https://www.cleveland.com/court-justice/2014/11/cleveland_police_settlement_ch.html
34. **Malik Law** https://davidmaliklaw.com/team/david-malik/
35. **Shooting of Tyre King** https://www.usnews.com/news/us/articles/2021-02-17/officer-who-shot-tyre-king-13-argues-race-wasnt-a-factor
36. **Chanda L. Brown** https://www.nbc4i.com/news/tyre-king-13-killed-in-columbus-officer-involved-shooting/

37. **Shooting of Tyrell Wilson** https://www.sfchronicle.com/local/article/Family-of-Tyrell-Wilson-sues-Danville-over-fatal-16081816.php
38. **Estate of Valentina Orellana Peralta v. City of Los Angeles** https://knock-la.com/wp-content/uploads/2022/11/courtcase-lapd-shooting-Valentina-Orellana-Peralta.pdf
39. **Nick Rowley** https://davisvanguard.org/2026/05/lapd-shooting-civil-trial
40. **Trial Lawyers for Justice** https://www.legalnewsline.com/south-california-record/jury-ends-family-s-100m-suit-vs-lapd-over-girl-s-accidental-shooting-death/article_0cd80e2b-8772-48c2-adf7-f3c8470987cf.html
41. **The Law Offices of Haytham Faraj (Faraj Law)** https://www.farajlaw.com/
42. **Trial Lawyers for Justice** https://blog.cvn.com/lapd-cop-faces-civil-trial-over-fatal-department-store-shooting-watch-online-via-cvn
43. **Shooting of VonDerrit Myers Jr.** https://molawyersmedia.com/2016/01/22/wrongful-death-suit-filed-over-st-louis-police-shooting/
44. **Shooting of Walter Scott** https://provenverdicts.com/stewart-miller-simmons-trial-attorneys/proven-verdicts/walter-scott-north-charleston-6-5-million-settlement
45. **Shooting of Willie McCoy** https://www.sacbee.com/news/california/article284073448.html
46. **Law Offices of John L. Burris** https://fr.scribd.com/document/326782336/Gongora-et-al-v-CCSF-et-al
47. **Adante Pointer** https://www.vallejosun.com/the-willie-mccoy-tapes-inside-the-vallejo-police-investigation/
48. **Public incident record** https://www.star-telegram.com/news/local/fort-worth/article317562615.html
49. **Incident record** https://www.supremecourt.gov/opinions/19pdf/17-1678_m6io.pdf?mod=article_inline
50. **Representation record** https://www.prnewswire.com/news-releases/lawyers-seek-supreme-court-review-of-border-patrol-shooting-case-300118192.html
51. **Representation record** https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/17-1678.html
52. **Public incident record** https://www.courthousenews.com/wp-content/uploads/2026/10/gagne-v-city-of-mesa-complaint.pdf
53. **Public incident record** https://www.wxyz.com/news/family-of-detroit-man-killed-during-eviction-files-150-million-federal-lawsuit
54. **Public incident record** https://www.washingtonpost.com/immigration/2026/10/08/lawsuit-accuses-ice-executing-immigrant-silverio-villegas-gonzalez-near-chicago/
55. **Representation record** https://www.cleveland.com/court-justice/2015/10/attorneys_for_tamir_rices_fath.html
56. **Public incident record** https://www.fox13memphis.com/news/only-on-fox13-fox13-investigates-obtains-security-footage-of-deadly-mpd-involved-shooting/article_a0bd3f15-edcf-4357-9dc2-1ba06be00fad.html
57. **Incident record** https://captimes.com/news/local/govt-and-politics/police-union-3-35-million-civil-rights-suit-settlement-casts-a-pall-over-matt-kenny/article_b38a3bb6-c843-5fb1-a2cf-20929799ea47.html
58. **Public incident record** https://www.cbsnews.com/atlanta/news/family-hires-civil-rights-attorneys-after-officer-fatally-shoots-16-year-old-in-stockbridge/
59. **Local Memphis, November 2, 2026** https://www.localmemphis.com/article/news/local/tyrin-johnsons-attorney-releases-statement-after-video-of-fatal-shooting-released/522-35f51c91-8a82-4e79-b75f-12dc83396699
60. **Shelby County Election Commission biography** https://www.electionsshelbytn.gov/andre-wharton/
61. **CBS/AP, November 3, 2026** https://www.cbsnews.com/news/bodycam-video-moments-after-man-fatally-shot-national-guard-memphis/
62. **Public incident record** https://www.abc15.com/news/local-news/family-files-lawsuit-against-city-of-phoenix-officers-over-suicidal-mans-shooting-death
63. **Public incident record** https://www.eastidahonews.com/2025/09/victor-perez-attorney-says-litigation-is-going-to-start-in-earnest
64. **Public incident record** https://www.supreme.justia.com/cases/federal/district-courts/FSupp/550/81/1451872/

STEVE WOLF

About the author

I am Steve Wolf, a firearms instructor, safety consultant, author, and expert witness. (Wolf) My work includes firearm handling, human factors, and the investigation of shooting incidents for plaintiff and defense counsel. (Wolf, firearm-handling guide)

Firearms experience and police instruction

During my range-instruction career, I trained police officers and members of Special Weapons and Tactics (SWAT) teams. I also worked with the Shelby County Sheriff's Office. That experience gave me contact with law-enforcement personnel and the situations those personnel encounter. I have never been a police officer, and I do not present that work as sworn police service.

Firearms instruction provides a practical basis for examining how a person handled a weapon, what the person learned, and how instruction addressed the conduct under review. My work with officers also informs the questions I ask about training, equipment, communication, and the circumstances of a shooting. Those questions require incident-specific answers, not assumptions about how every officer or agency operates.

Independence from a police career

My experience comes from teaching and examining firearm use, not from a career inside a police chain of command. I do not approach an officer's conduct as something to defend because the officer wears a badge. I also do not treat the badge as evidence of wrongdoing.

That outside perspective is a strength when the assignment requires an independent examination of police conduct. I can evaluate a handling practice without treating departmental acceptance as proof that

the practice was safe or appropriate. My work with law-enforcement personnel provides practical context without requiring me to defend a former police career.

Independence requires more than a statement that an expert has no bias. I examine evidence that contradicts the retaining party's account, distinguish measurements from assumptions, and identify information that could change an opinion. I apply the same technical standards whether counsel represents an injured person, an officer, or another defendant.

Relevant writing

My books and reference guides address firearm handling, use of force, bystander injuries, firearm defects, concealed carry, and firearms safety on set. (Wolf) Related titles include the following works. (Wolf, firearm-handling guide)

- **Firearm Handling, Use-of-Force, and Bystander Injury Litigation: A Reference Guide for Plaintiff and Defense Counsel.** Read the reference guide
- **Firearm Product-Defect Litigation.** Wolf Safety Series listing
- **The Smart Citizen's Guide to Concealed Carry.** Wolf Safety Series listing
- **Firearms Safety On Set.** Wolf Safety Series listing

Writing requires me to explain the relationship among firearm operation, human conduct, safety practices, and the evidence needed to evaluate a disputed event. In expert work, I use that same discipline to make the technical basis of an opinion understandable and open to examination.

The scope of an expert assignment

My contribution concerns the technical questions that match my training and experience: firearm handling, safety instruction, human factors, and the physical sequence under investigation. I distinguish those subjects from legal rulings and from specialized examinations that require another discipline.

Experience alone does not establish that a particular opinion is admissible. Under Federal Rule of Evidence 702, the proponent must establish the required qualifications, helpfulness, factual basis, reliable methods, and reliable application to the case. (Federal Rule of Evidence 702) I define the assignment, identify the evidence and methods supporting each opinion, and state the limits of the available information.

SOURCES

1. **Wolf** https://firearms-handling-use-of-force-cases.netlify.app/
2. **Federal Rule of Evidence 702** https://www.law.cornell.edu/rules/fre/rule_702