

DISCOVERY REQUEST MENU

Master Checklist for Police Misconduct Litigation

Expert Witness Working Document: Collaborative Case-Planning Tool

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PoliceMisconductPro.com

CASE INFORMATION

Case name: _____

Court / Case No.: _____

Agency / Department: _____

Named officers: _____

Incident date: _____

Retaining attorney: _____

Claims asserted: _____

Agreed lookback period(s): _____

HOW TO USE THIS MENU

This menu is a master brainstorming checklist of records and information that may be requested in discovery in police misconduct litigation. It is designed as a collaborative working tool: the expert and retaining attorney review the menu together and check off the items applicable to the case at hand. The checked items can then be adapted into formal Requests for Production, interrogatories, or subpoenas.

Not every item applies to every case. Items are organized into three tiers:

- Records about the incident,
- Records about the individual officers, and
- Department-wide records supporting Monell claims, plus claim-specific add-on modules at the end.

Lookback periods: For officer-specific and department-wide records, specify a time window (commonly 5–10 years preceding the incident, or the officer's full career for personnel and complaint histories). Insert the agreed window wherever an item refers to “the lookback period.”

Two-step strategy: For voluminous categories (internal investigations, insurance payouts, litigation history), request a summary list first: date, title/case number, parties or officers named, allegation type, disposition, and dollar amount where applicable. Use the summary list to identify the specific underlying files worth requesting in full. This defeats “unduly burdensome” objections and focuses follow-up requests.

Preservation: Serve a litigation-hold/preservation letter early covering every category below, especially body-worn camera footage, CAD data, TASER downloads, and text messages, which are commonly subject to short retention schedules.

TIER I: THE INCIDENT

Records specific to the event at issue. These establish what happened, what the officers claimed at the time, and whether their contemporaneous accounts match the objective evidence.

A. Core Reports & Written Records

- ☐ **Police / incident / arrest reports, all versions.** *Include drafts, amendments, revisions, and supplemental reports by every officer on scene. Draft-to-final changes and inconsistencies between officers' narratives are often the strongest impeachment evidence.*
- ☐ **Use-of-force / response-to-resistance reports** (e.g., Tactical Response Reports.) *For every officer who used, witnessed, or reported force. Establishes what force each officer admitted using and whether reporting obligations were met.*
- ☐ **Probable cause affidavit / declaration and all charging documents.** *Locks in the contemporaneous justification for the arrest so it can be compared against video, radio traffic, and later testimony.*
- ☐ **Citations, field interview cards, and stop-data forms.** *Contemporaneous paper trail of the stop or contact; stop-data forms often contain the officer's stated legal basis.*
- ☐ **Officers' field notes, memo books, and handwritten notes.** *Raw notes frequently differ from the polished report and are routinely omitted from initial productions unless specifically requested.*
- ☐ **Supervisor's on-scene response report and watch commander / shift logs.** *Shows whether a supervisor responded, what was reported up the chain, and whether required scene review occurred.*
- ☐ **Warrants (arrest or search) with applications, supporting affidavits, and returns.** *The affidavit's factual claims can be tested against the evidence; defects support Fourth Amendment and judicial-deception theories.*
- ☐ **Consent-to-search and Miranda waiver forms.** *Absence of a signed form undercuts later claims of consent or waiver.*
- ☐ **Crime scene / incident scene entry log.** *Identifies every person present, potential witnesses the reports may not name.*
- ☐ **Supervisory use-of-force screening or review for this incident.** *Shows whether the department's own review process functioned; a rubber-stamp review feeds the Monell ratification theory.*
- ☐ **Department database entries about the plaintiff.** *Gang database, intelligence files, flags, and prior-contact records. Shows what the officers thought they knew about the plaintiff, and whether the entries were accurate or stale.*

B. Dispatch & Communications

- ☐ **911 call recordings and call-taker notes.** *The original report of the incident, what officers were actually told, versus what they later claimed to know.*
- ☐ **Computer-aided dispatch (CAD) report, complete, with all notes.** *Include every entry, timestamp, unit status change, and the full event chronology. CAD timestamps build the objective timeline against which officer accounts are tested.*
- ☐ **Radio traffic audio for the call and its dispatching.** *All channels used, from dispatch through clearance. Real-time statements often contradict after-the-fact reports.*
- ☐ **MDT / MDC (in-car computer) messages.** *Messages between involved officers and dispatch around the incident; officers are often candid on MDT in ways they are not in reports.*

- ☐ **Officers' cell phone records, text messages, and emails about the incident.** *Before, during, and after the event, including personal devices used for work purposes. Frequently reveals coordination of accounts.*
- ☐ **GPS / AVL data for involved units.** *Fixes vehicle locations and speeds independent of officer testimony.*

C. Video, Audio & Digital Evidence

- ☐ **Body-worn camera video, every officer on scene, full and unredacted.** *Include the pre-activation buffer, all metadata, and the audit trail (uploads, views, edits, sharing, deletions). The audit trail shows who reviewed footage before writing reports, and whether anything was altered or deleted.*
- ☐ **Dash camera / in-car video.** *Covers the approach and vehicle positioning that BWC often misses.*
- ☐ **BWC activation compliance for this incident.** *Was activation required by policy, did each officer comply, and was any non-activation addressed? Unexplained non-activation is both an adverse-inference issue and Monell evidence.*
- ☐ **Third-party surveillance video collected or identified.** *Businesses, residences, transit systems, city cameras. Ask both for what was collected and for canvass records showing what was identified but not collected.*
- ☐ **Facility video, transport, sally port, booking, holding cell, interview room.** *Injuries and statements documented at the station frequently contradict use-of-force narratives.*
- ☐ **Bystander / cell phone video collected or referenced.** *Include any records of officers seizing, requesting, or discouraging bystander recording.*
- ☐ **TASER / CEW data download and deployment logs.** *The internal download records exact trigger pulls, cycle durations, and timestamps, objective data that regularly contradicts reports.*
- ☐ **ALPR, drone / air support, and real-time crime center records.** *Additional objective location and observation data for the incident window.*
- ☐ **Acoustic gunshot detection data (e.g., ShotSpotter).** *Alert timestamps and audio, where deployed, an independent timeline anchor, and the alert's content can be compared against the claimed justification for the stop.*
- ☐ **All photographs taken by officers or evidence technicians.** *Scene photos plus injury photos of both the plaintiff and the officers.*

D. Physical Evidence & Forensics

- ☐ **Evidence / property reports, inventories, and chain of custody.** *Gaps in the chain and undocumented handling support spoliation and credibility arguments.*
- ☐ **Laboratory and forensic reports.** *Any testing performed on evidence from the incident.*
- ☐ **Force instruments involved and their inspection / maintenance records.** *Firearm, TASER, OC canister (weight before/after), baton, restraints. Maintenance records may show known defects.*
- ☐ **Plaintiff's property and booking inventory.** *Documents what was taken, damaged, or lost.*
- ☐ **Evidence retention / destruction records and litigation-hold notices.** *Establishes what existed, what was destroyed, and when, the foundation for any spoliation motion.*

E. Medical & Injury Documentation

- ☐ **Fire / EMS run sheets and paramedic patient care records.** *First independent medical observations, including the plaintiff's statements and officers' statements to medics.*

- ☐ **Jail / booking medical intake screening records.** Documents injuries and complaints at intake, or the failure to document them.
- ☐ **Records of any delay, denial, or refusal of medical care.** Supports a denial-of-care claim and shows consciousness of injury.
- ☐ **Injury photographs, plaintiff and officers.** Officer injury photos (or their absence) test claims that force was needed for self-defense.
- ☐ **Workers' compensation or injury-on-duty reports filed by involved officers.** Officer injury claims corroborate or contradict the resistance narrative, and their absence speaks volumes.

F. Arrest, Booking & Prosecution

- ☐ **Booking records, mugshots, and arrest processing paperwork.** Timestamps, charges as booked, and physical condition at booking.
- ☐ **Detention / holding records, cell checks, and release paperwork.** Duration and conditions of detention; relevant to damages and to any over-detention claim.
- ☐ **Prosecutor communications and charging decision records.** Include declinations, nolle prosequi, and dismissal records with stated reasons. A no-charge outcome or credibility-based declination is powerful false-arrest evidence.
- ☐ **Transcripts of testimony already given.** Preliminary hearing, grand jury, or suppression hearing testimony locks officers into sworn accounts.
- ☐ **Suppression motion rulings in the criminal case.** A judicial finding of no probable cause or an unlawful search is near-dispositive on the Fourth Amendment claim.

G. Post-Incident Review & Communications

- ☐ **After-action reviews, use-of-force board findings, and critical incident debriefs for this event.** The department's own contemporaneous evaluation, and whether concerns were raised and then buried.
- ☐ **Internal emails, texts, and memoranda among command staff regarding the incident or the plaintiff.** Command-level reaction shows notice, ratification, or attempts to manage the narrative.
- ☐ **Press releases and public statements about the incident.** Public claims can be tested against the evidence; false public narratives support ratification.
- ☐ **Did the filing of this lawsuit trigger an internal investigation?** A federal lawsuit is a formal notice of alleged misconduct, reviewed by counsel trained in constitutional law, and carries more weight than a counter complaint. If no responsive internal investigation was opened, that failure flags deliberate indifference at the executive level. Request the full IA file if one exists, or a written statement that none was opened.
- ☐ **Garrity / compelled statements of involved officers.** Administrative statements often differ from criminal-side or report accounts. (Note: may draw privilege objections; request and litigate as needed.)
- ☐ **Early Intervention System entries generated by this incident.** Shows whether the department's own risk-flagging system registered the event and what, if anything, was done.

TIER II: THE INDIVIDUAL OFFICERS

Requested separately for each named officer. Specify the lookback period (full career for personnel and complaint histories; a defined window for volume data). These records support the individual claims and simultaneously build notice for the Monell claim.

A. Personnel & Employment History

- ☐ **Complete personnel file.** *The baseline request, but never assume it is complete; the specific items below often live outside the official file.*
- ☐ **Hiring and background investigation file, including pre-employment psychological screening.** *Prior law enforcement employment, reasons for separation, and any red flags known at hire support negligent-hiring and "wandering officer" theories.*
- ☐ **Assignment, rank, and promotion history with performance evaluations.** *Promotions or choice assignments despite a troubled record support ratification.*
- ☐ **Fitness-for-duty evaluations and duty restrictions.** *Known concerns about judgment or temperament bear on notice and supervision.*
- ☐ **Secondary / off-duty employment records.** *Relevant where the incident touches off-duty conduct, fatigue, or moonlighting-related issues.*
- ☐ **Duty schedules, overtime, and hours worked in the period preceding the incident.** *Fatigue impairs judgment and de-escalation; an officer deep into overtime or a double shift is a fact the jury should hear, and chronic overtime is a supervision issue.*
- ☐ **Commendations and awards.** *Useful for context and to anticipate the defense's character presentation.*

B. Complaints & Discipline

- ☐ **Complete complaint history, all dispositions, citizen and internal.** *Include sustained, not sustained, unfounded, and exonerated findings, and informal complaints never formally logged. Pattern and notice do not depend on sustain rates, a string of "not sustained" similar complaints is itself evidence the system failed to respond.*
- ☐ **Full internal affairs files for prior complaints similar to the claims in this case.** *The underlying files show investigation quality: were witnesses interviewed, video reviewed, findings supported?*
- ☐ **Disciplinary history, formal AND informal.** *Counseling memos, verbal reprimands, remedial-training referrals, and supervisor performance logs. Informal discipline typically lives in supervisor files, not the official personnel folder, request both by name.*
- ☐ **Early Intervention System entries, alerts, and threshold reports for this officer, with supervisory responses.** *If the officer tripped EIS thresholds and nothing happened, that is direct failure-to-supervise evidence.*
- ☐ **Grievances and arbitrations that reduced or overturned discipline of this officer.** *Shows whether accountability was imposed and then undone, relevant to whether discipline deterred anything.*

C. Use-of-Force & Performance History

- ☐ **Complete use-of-force / response-to-resistance report history.** *Frequency, types of force, and subject demographics reveal patterns and supervisory notice.*

- ☐ **Arrest-outcome data: volume, no-charge and dismissal rates, suppression rulings.** *A documented history of arrests that did not result in charges, or that drew suppression rulings, shows a pattern of weak probable cause and supervisory notice of it.*
- ☐ **BWC activation and compliance history, audits, and related discipline.** *A habit of non-activation is impeachment and pattern evidence.*
- ☐ **Vehicle pursuit history.** *Where relevant, frequency and policy compliance.*
- ☐ **Firearms discharge history.** *All prior discharges, intentional and accidental, with review outcomes.*

D. Training & Certification

- ☐ **Complete training records, academy and in-service, with dates, course titles, and hours.** *Flag courses pertinent to the claims: use of force, de-escalation, arrest authority / probable cause, search and seizure, duty to intervene, report writing.*
- ☐ **Curricula, lesson plans, and instructional materials for each pertinent course, with attendance verification.** *What the officer was actually taught, the standard against which the conduct is measured, and the foundation for both "violated their own training" and failure-to-train opinions.*
- ☐ **Certifications and qualifications, including any lapses.** *Firearms qualifications, TASER certification, defensive tactics, FTO certification. A lapsed certification at the time of the incident is significant.*
- ☐ **State POST certification status and any decertification proceedings or referrals.** *Bears on both the officer's fitness and the department's knowledge.*
- ☐ **Remedial training ordered and completion records.** *Ordered-but-never-completed remediation is failure-to-supervise evidence.*
- ☐ **Field training (FTO) evaluations from the probationary period.** *Early documented deficiencies that persisted show the department knew from day one.*

E. Credibility & Litigation History

- ☐ **Brady / Giglio status, disclosure letters, and any prosecutor do-not-call lists.** *A Brady-listed officer has a judicially significant credibility problem, and the department's continued deployment of that officer is Monell evidence.*
- ☐ **Litigation history: every §1983 or state tort suit naming the officer, with dispositions and settlements.** *Prior suits are notice; settlements are pattern evidence.*
- ☐ **Sustained findings of dishonesty, false reporting, or perjury.** *Directly admissible impeachment in most jurisdictions.*
- ☐ **Prior deposition and trial testimony transcripts from other lawsuits.** *Sworn accounts of how the officer describes force, probable cause, and training in other cases, a rich and frequently overlooked source of inconsistencies.*
- ☐ **Any criminal history or arrests of the officer.** *Including conduct handled administratively in lieu of charges.*
- ☐ **Public social media posts and department social media conduct records.** *Posts revealing bias, aggression, or discussion of the incident are impeachment and notice evidence.*

TIER III: THE DEPARTMENT (MONELL)

Department-wide records supporting municipal liability: unconstitutional policy or custom, failure to train / supervise / discipline, ratification, and deliberate indifference. Define the lookback period (commonly 5–10 years preceding the incident).

A. Policies & Procedures

- ☐ **All general orders, special orders, SOPs, directives, and training bulletins in effect on the incident date.** *Covering: use of force, de-escalation, arrest and probable cause, search and seizure, handcuffing and restraints, foot and vehicle pursuits, body-worn cameras, duty to intervene, rendering medical aid, complaint intake, discipline, and supervision. These set the department's own standard of care.*
- ☐ **Prior and subsequent versions of those policies, with revision histories, drafts, and memoranda.** *Post-incident amendments suggest recognized deficiencies; a policy that lagged known national standards shows deliberate indifference.*
- ☐ **Policy review and legal review records.** *Shows whether anyone audited policies against evolving law, or whether they gathered dust.*
- ☐ **Policy on officers reviewing BWC footage before writing reports or giving statements.** *Pre-report video review lets an officer write to the footage rather than from memory. The policy, and whether these officers reviewed video first (cross-check the BWC audit trail), goes to both credibility and Monell.*
- ☐ **Accreditation records (e.g., CALEA) and self-assessment reports.** *Self-identified deficiencies are admissions of notice.*
- ☐ **Mutual aid agreements and task force MOUs.** *Where multiple agencies were involved, establishes whose policies governed and who supervised.*
- ☐ **Collective bargaining agreement provisions on discipline, IA procedures, and records purging.** *Contractual purge clauses explain record gaps and can themselves be a custom that insulates misconduct.*

B. Training Program (Department-Wide)

- ☐ **Recruit and in-service curricula and lesson plans on pertinent topics for the lookback period.** *Fourth Amendment / probable cause, use of force, de-escalation, duty to intervene, report writing. The content, or its absence, is the core of a failure-to-train claim.*
- ☐ **Training schedules, rosters, and completion rates department-wide.** *A curriculum on paper that officers never actually attended is a failure-to-train fact pattern.*
- ☐ **Instructor qualifications and instructor files.** *Unqualified instructors or instructors with their own misconduct histories undercut the training defense.*
- ☐ **Training needs assessments and records of identified training deficiencies.** *Documented known gaps that went unaddressed are deliberate-indifference evidence.*
- ☐ **State POST minimum training requirements and department compliance reports.** *Falling below the state's own floor is a powerful baseline for failure to train.*
- ☐ **Supervisor training curriculum and the training records of the supervisors in the chain of command.** *Failure to train the supervisors, on force review, complaint handling, EIS response, is its own Monell theory, and one departments rarely expect to defend.*

C. Complaint Intake & Internal Affairs System

- ☐ **Summary list of ALL internal investigations for the lookback period.** *Fields: date, case title / number, summary of allegations, officers named, and final disposition. The summary-first approach defeats burden objections and identifies which underlying files to demand.*
- ☐ **Summary list of all citizen complaints, including those screened out or never investigated.** *Complaints that never became investigations reveal intake suppression, which is itself a Monell custom.*
- ☐ **Complaint intake policies and public accessibility of the process.** *Forms, online submission, anonymous complaints, front-counter procedures. Barriers to complaining depress the numbers the defense will cite.*
- ☐ **Sustain rates and discipline imposed, broken down by allegation type.** *A near-zero sustain rate for force complaints, department-wide, is classic pattern evidence.*
- ☐ **Full IA files for complaints similar to the conduct alleged in this case.** *Selected from the summary list, to show investigation quality and outcomes for comparable conduct.*
- ☐ **Audits or reviews of the internal affairs function.** *Internal or external critiques of IA quality show the municipality knew its accountability system was broken.*
- ☐ **Complaint-handling records specific to the named officers.** *Timeliness, thoroughness, and disposition of every complaint against these officers, the bridge between Tier II and the Monell claim.*

D. Supervision, Review & Early Intervention

- ☐ **Early Intervention / Early Warning System policy, thresholds, and department-wide summary data.** *Alerts generated, interventions taken, and outcomes. An EIS that generates alerts nobody acts on proves the supervision system is ornamental.*
- ☐ **Use-of-force review board records for the lookback period.** *Cases reviewed, findings, and any training or discipline referrals, a 100% "within policy" rate is ratification evidence.*
- ☐ **Use-of-force report audits and force statistics.** *Whether anyone checked that force reports were filed, complete, and truthful.*
- ☐ **Supervisory review requirements for arrests and force, with compliance audits.** *Sergeant sign-offs that were rubber stamps show failure to supervise.*
- ☐ **Disciplinary matrix and data on consistency of its application.** *Wild inconsistency, or systematic leniency for force and honesty violations, is a custom of tolerance.*
- ☐ **Promotion and retention decisions for officers with sustained complaints.** *Promoting known violators communicates that misconduct carries no career cost: ratification.*
- ☐ **Organizational chart, chain of command, and supervisor staffing ratios on the incident date.** *Identifies the policymakers and shows whether supervision was structurally adequate.*

E. Pattern & Notice Evidence

- ☐ **Insurance / claims payout history for police misconduct.** *A summary list of every claim paid, by the agency itself, its insurer, its risk pool or insurance authority, or a self-insurance fund, with date, claim title / claimant, claim type (excessive force, false arrest, etc.), disposition, and dollar amount. A history of payouts on similar claims shows the municipality was on notice of the pattern and kept paying rather than fixing it. Summary format only; no privileged detail required.*
- ☐ **Insurer / risk pool loss runs and risk-management correspondence.** *Insurer warnings, premium increases tied to misconduct losses, and loss-control recommendations are third-party notice the municipality cannot claim ignorance of.*
- ☐ **All settlements and judgments in police misconduct cases for the lookback period.** *Includes confidential settlements, amounts and allegation types establish the pattern.*

- ☐ **Litigation list: every §1983 or state tort suit against the department or its officers, with dispositions.** *The raw docket-level pattern, independent of what the department paid.*
- ☐ **Notices of claim, demand letters, and pre-suit complaints received.** *Notice arrives before lawsuits do; these show the earliest dates the municipality knew.*
- ☐ **Policy or practice regarding opening internal investigations upon the filing of lawsuits.** *Companion to the Tier I item: does the department treat a federal lawsuit, vetted by counsel trained in constitutional law, as the formal misconduct complaint it is? A practice of ignoring lawsuits as complaint intake is systemic deliberate indifference.*
- ☐ **Records of prior incidents factually similar to the plaintiff's.** *Force reports, complaints, and lawsuits involving the same type of conduct, the tighter the factual match, the stronger the Monell showing.*
- ☐ **Correspondence to the chief, city manager, or council about the named officers or the practices at issue.** *Community letters, town hall records, and council meeting minutes documenting public warnings the leadership received.*

F. External Oversight & Audits

- ☐ **DOJ or state Attorney General investigations, findings letters, consent decrees, and monitor reports.** *Federal or state findings of a pattern or practice are the gold standard of municipal notice. Include the department's own compliance reports and corrective action plans, which are admissions of the identified deficiencies.*
- ☐ **Civilian oversight body reports, audits, and recommendations, with department responses.** *Police commission, inspector general, or civilian review board critiques, and whether the department implemented or ignored them. Ignored recommendations are deliberate indifference in documentary form.*
- ☐ **Grand jury reports or judicial findings criticizing department practices.** *Judicial criticism in prior cases is notice at the highest level of formality.*
- ☐ **Outside consultant studies of use of force, training, or discipline.** *Commissioned studies the department then shelved are notice plus indifference in one document.*

G. Data, Statistics & Administration

- ☐ **Department-wide use-of-force statistics by type and year.** *Trend data contextualizes the incident and the named officers' histories.*
- ☐ **Arrest statistics, stop data, and demographic breakdowns.** *Relevant to pattern, and to any selective-enforcement dimension of the case.*
- ☐ **BWC program compliance audits.** *Department-wide non-activation rates show whether the accountability tool actually functions.*
- ☐ **CompStat or performance-management records tied to arrest productivity.** *Pressure to produce arrest numbers is a custom that manufactures weak-probable-cause arrests.*
- ☐ **Duty rosters and assignment records for the incident date.** *Identifies every officer working, potential witnesses beyond those named in reports.*
- ☐ **Records retention schedules and destruction logs for every category requested.** *Establishes what should still exist; destruction after notice of the claim is spoliation.*
- ☐ **Recruitment, hiring standards, and staffing / vacancy data for the lookback period.** *Lowered hiring standards or chronic understaffing during a recruitment crisis, waived background checks, relaxed disqualifiers, compressed academies, supports failure-to-screen and failure-to-train theories.*

TIER IV: CLAIM-SPECIFIC ADD-ON MODULES

Supplemental item sets to layer onto Tiers I–III when the case involves these specific fact patterns.

Module 1: Officer-Involved Shooting

- ☐ **Complete shooting investigation file (criminal and administrative sides).** *Including round counts, casing locations, trajectory analysis, and scene reconstruction.*
- ☐ **Shooting review board findings and any state or public-integrity investigation.** *The department's own adjudication of the shooting, and any independent review.*
- ☐ **Officer walk-through statements and interview timing records.** *How long after the shooting the officer was interviewed, and whether video review was permitted first. Both affect the account's reliability.*
- ☐ **Medical examiner / autopsy reports and scene photographs.** *Wound paths and ranges tested against the officer's account.*
- ☐ **Officer's firearms qualification and low-light / decision-making training records.** *Qualification lapses and training content bear on both the individual and Monell claims.*
- ☐ **Prior firearms discharges department-wide and their review outcomes.** *Pattern of "justified" findings regardless of facts supports ratification.*

Module 2: TASER / Less-Lethal Force

- ☐ **CEW data download, deployment logs, and device maintenance records.** *Exact trigger pulls, cycle durations, and timestamps, plus device model and firmware version.*
- ☐ **Manufacturer warnings, bulletins, and training materials in the department's possession.** *Axon warnings (e.g., cardiac risk, prolonged exposure, elevated targets) the department received but did not train on are Monell evidence.*
- ☐ **Department policy on cycle limits, vulnerable populations, and drive-stun use.** *Tested against national standards and manufacturer guidance.*
- ☐ **Impact munitions / OC / baton deployment records and policies, as applicable.** *Same analysis for other less-lethal tools used.*

Module 3: K-9 Deployment

- ☐ **Canine deployment report and handler's use-of-force report.** *The specific commands, warnings given, and duration of the bite.*
- ☐ **This dog's complete bite and deployment history.** *Bite ratio (bites per apprehension) is the standard metric; a high ratio shows notice.*
- ☐ **Handler and canine training and certification records.** *Including any failed certifications and the training standard used (find-and-bark vs. find-and-bite).*
- ☐ **Department-wide K-9 deployment statistics and bite ratios.** *Pattern evidence across the unit.*
- ☐ **Call-off policy and records of prior failures to release.** *A dog that does not release on command, repeatedly, is a known danger.*
- ☐ **Veterinary and kennel records.** *Health or behavioral issues bearing on the dog's reliability.*

Module 4: Vehicle Pursuit

- ☐ **Pursuit report and supervisor authorization / termination decisions.** *Whether policy required termination and whether supervisors enforced it in real time.*
- ☐ **Radio traffic and AVL / GPS data for the full pursuit.** *Speeds, route, and duration independent of officer estimates.*
- ☐ **Crash report and any reconstruction.** *Where the pursuit ended in a collision.*
- ☐ **Officer's EVOC / pursuit driving training records.** *And the department-wide pursuit training curriculum.*
- ☐ **Department pursuit history and statistics for the lookback period.** *Prior pursuit crashes and injuries show notice of the risk.*

Module 5: Denial of Medical Care / In-Custody Death or Injury

- ☐ **All medical intake screenings, medical logs, and medication records.** *What the jail or lockup knew about the detainee's condition and when.*
- ☐ **Cell check logs and supervision records, tested against video.** *Falsified cell checks are common and provable against facility video timestamps.*
- ☐ **Detox / withdrawal and mental health protocols in effect.** *And compliance records. Withdrawal deaths are a recurring deliberate-indifference pattern.*
- ☐ **Contracted medical provider records and the provider contract itself.** *Staffing levels, cost-containment incentives, and prior complaints against the provider.*
- ☐ **Autopsy, toxicology, and death investigation file.** *For in-custody deaths.*
- ☐ **Prior in-custody deaths and serious medical events for the lookback period.** *Pattern and notice at the facility level.*

Module 6: Search Warrant Execution / Home Entry

- ☐ **Warrant affidavit, informant file, and informant reliability records.** *The CI's track record tests the affidavit's claimed reliability. (Expect privilege litigation; request in camera review.)*
- ☐ **Pre-raid briefing materials, operations plan, and risk assessment matrix.** *What the team knew going in, occupants, children, address verification steps.*
- ☐ **SWAT / tactical team deployment records and after-action report.** *Whether tactical deployment was justified under the department's own criteria.*
- ☐ **Knock-and-announce evidence: video, witness statements, timing.** *Entry mechanics against constitutional and policy requirements.*
- ☐ **Damage documentation and claims for property damage.** *Scope of the intrusion and damages.*
- ☐ **Prior wrong-address or bad-warrant raids for the lookback period.** *Pattern of sloppy verification is Monell evidence.*

Module 7: First Amendment Retaliation / Recording Police

- ☐ **Communications referencing the plaintiff's speech, recording, or complaints.** *Direct evidence of retaliatory motive.*
- ☐ **Records of surveillance or monitoring of protest activity or social media.** *Including any intelligence files on the plaintiff.*
- ☐ **Arrest patterns at protests or involving people recording police.** *Charges like obstruction or interference used as retaliation vehicles.*

- ☐ **Department policy and training on the public's right to record.** *Absence of such training after well-established case law supports failure to train.*

Module 8: Mental Health Crisis / Crisis Intervention

- ☐ **911 call-taker and dispatcher mental-health triage protocols and this call's classification.** *Whether the call was flagged as a mental-health crisis, and whether that information reached the responding officers.*
- ☐ **Crisis Intervention Team (CIT) training records for the involved officers.** *Whether they were CIT-trained, when, and what the curriculum covered, force used on a person in crisis is measured against crisis-response training standards.*
- ☐ **CIT program structure, staffing, and dispatch policy.** *Whether a CIT-trained officer or co-responder was available and required to be dispatched, and why one wasn't.*
- ☐ **Co-responder / clinician program records and mobile crisis team availability.** *If a non-police response option existed and was bypassed, that decision is discoverable.*
- ☐ **Department policies on responding to persons in mental health crisis, and de-escalation requirements.** *The department's own standard for slowing down, creating distance, and using time, tested against what the officers did.*
- ☐ **Prior force incidents and complaints involving persons in crisis, for the lookback period.** *A pattern of force against people in crisis, without training or policy response, is a recurring and well-recognized Monell theory.*

CASE-SPECIFIC ADDITIONS & NOTES