I have reviewed the surveillance video, Correctional Deputy Larman and Correctional Deputy Mann's body worn camera footage, and read the incident report (M2019-0816-10).

I realize even video footage of the event won't give me the entire picture of the event. I haven't spoken to any of the correctional deputies involved in the incident and I am not aware of any statements given by them.

These are my opinions based upon reading the incident report and watching the videos.

1. CD Mann takedown of Espinoza-Villalobos.

According to the incident report, Correctional Deputy Mann used a "head pull" takedown to bring Espinoza-Villalobos to the ground. The technique is part of the Detention Division DT program and is taught as a "hair pull" or "forehead sweep takedown." The technique is commonly modified due to an inmate's lack of hair to grab. Correctional deputies are taught that it is appropriate to modify the technique if it is needed to complete the takedown of the inmate.

Espinoza-Villalobos had recently made threats towards Correctional Deputy Mann and they were in close proximity to each other. Espinoza-Villalobos tensed his body and turned towards Correctional Deputy Mann. Correctional Deputy Mann believed Espinoza-Villalobos was preparing to assault him.

I believe the takedown was a reasonable use of force. Putting Espinoza-Villalobos on the ground diminishes his ability to assault Correctional Deputy Mann.

2. CD Larman 3 punches to Espinoza-Villalobos' midsection.

A closed fist strike is commonly known as a "punch." Closed fist strikes aren't taught as part of our curriculum in the Detention Division DT program, but they aren't banned. We teach two strikes using the hands. The "Bottom Fist Strike" and the "Palm Heel Strike." I have listed a description of both below.

Bottom Fist Strike: Closed fist, strike with bottom of fist.

Palm Heel Strike: Fingers curled up, thumb in, strike with meaty part of palm.

Closed fists strikes are discouraged because of the increased risk of injury to the correctional deputy delivering the strike. They may break their hand on a hard body part of the target or hit another hard object if they miss their intended target. Closed fist strikes aren't treated much differently than a bottom fist strike or a palm heel strike in regards to the level of force delivered.

Correctional Deputy Larman delivered three closed fist strikes to Espinoza-Villalobos' midsection. Correctional Deputy Larman wrote in the incident report that Espinoza-Villalobos was "grabbing at Deputy Mann and myself" and was "fearful Espinoza was attempting to assault Mann, Wells, myself, or grab items

off our person such as our department issued oleoresin capsicum spray (O.C. Spray), X26 Taser, keys or other items which could be used as a weapon."

Correctional Deputy Mann wrote that Espinoza-Villalobos grabbed his hand and he "Vocalized this to my partner (Correctional Deputy Larman). He also wrote, "Larman also yelled at Espinoza to let go of his hand."

I would consider the three closed fist strikes Correctional Deputy Larman delivered to Espinoza-Villalobos' midsection reasonable if Espinoza-Villalobos was attempting to assault staff or take a weapon off his body or Correctional Deputy Mann's body or if he reasonably believed Espinoza-Villalobos was attempting to do so.

Espinoza-Villalobos was in the prone position with both his hands secured in waist restraints. People are still dangerous and can be assaultive while having their arms and legs secured in restraints, but it does lessen their ability to do so.

I was unable to see Espinoza-Villalobos grabbing Correctional Deputy Larman or Correctional Deputy Mann on the surveillance video or the body worn camera footage. Espinoza-Villalobos' hands were obscured from view for a large portion of the videos by either staff and/or the camera angle.

3. CD Mann 3 knee strikes to Espinoza-Villalobos' head.

A knee strike is part of the Detention Division DT program. We teach the correctional deputies to deliver knee strikes to standing targets and targets on the ground.

There are no restricted target areas for the knee strikes. They are taught that certain target areas can cause more severe damage than others. For example, a knee strike to the groin, neck, head, or throat will most likely cause more damage than a knee strike to the thigh, arm, or shoulder. They are taught the target area must be reasonable given the totality of the circumstances and the situation.

Correctional Deputy Mann wrote, "As we went to the ground, I lost control of Espinoza's right hand. I felt his right hand grab a tight hold of my left hand. His hand began grabbing at items on my duty belt."

Correctional Deputy Mann delivered three knee strikes to Espinoza-Villalobos' head. Correctional Deputy Mann wrote his intended target was Espinoza-Villalobos' right shoulder and upper torso. I believe knee strikes to the shoulder and upper torso area are reasonable if Espinoza-Villalobos was attempting to grab weapons on Correctional Deputy Mann's duty belt, holding on to his hand, or if Correctional Deputy Mann believed that Espinoza-Villalobos was doing so.

4. CD Larman 2 elbow strikes to Espinoza-Villalobos' head.

An elbow strike is part of the Detention Division DT program. We teach the correctional deputies to deliver elbow strikes to standing targets and targets on the ground.

There are no restricted target areas for the elbow strikes. They are taught that certain target areas can cause more severe damage than others. For example, an elbow strike to the groin, neck, or throat will most likely cause more damage than an elbow strike to the thigh, arm, or shoulder. They are taught the target area must be reasonable given the totality of the circumstances and the situation.

In the surveillance video, Correctional Deputy Larman delivers three closed fist strikes to Espinoza-Villalobos' midsection (addressed in question two). Then he delivers two elbow strikes to Espinoza-Villalobos' head. I read Correctional Deputy Larman's supplemental incident report (M2019-0816-10). I couldn't find any reference to the elbow strikes in his report or any other part of the incident report.

Espinoza-Villalobos was in the prone position with both his hands secured in waist restraints. People are still dangerous and can be assaultive while having their arms and legs secured in restraints, but it does lessen their ability to do so.

Correctional Deputy Larman wrote, "After my last strike, I could feel Espinoza pull his arms in towards his body, and he stopped stopped tensing and thrashing his body." The last strike he refers to in his incident report is a closed fist strike. The elbow strikes occur after the closed fist strikes.

The first elbow strike is partially obscured on the surveillance video, but the last elbow strike can be clearly seen on the surveillance video. Espinoza-Villalobos appears to be reasonably under control when Correctional Deputy Larman delivers the two elbow strikes to his head. They don't appear reasonable based upon the information I have read in the incident report or what I observed in the video.

5. CD Mann knee drop to Espinoza-Villalobos' upper right arm.

We teach the correctional deputies to use their legs or knees to help keep the inmates shoulder pinned to the ground and use their legs to restrict the movement of the inmates arm while holding it in a control hold. This technique is commonly used to control an inmates arms while they are on the ground while waiting for more staff members. You will also see it used when applying or removing restraints.

A knee drop isn't taught or part of the Detention Division DT program. We don't teach the correctional deputies to deliver a strike when transitioning to that position.

Correctional Deputy Mann does appear to land heavily on Espinoza-Villalobos' shoulder with his knee while transitioning to that position. I don't believe it would be reasonable if the knee to the shoulder was intended as an intentional strike if Correctional Deputy Mann believed he already had control of Espinoza-Villalobos.

I have seen several staff members land roughly on a person while trying to get into that position in real life and training scenarios. Many times it is because they are in a rush due to the stress of the situation and/or their physical limitations to move up and down easily.