

STATE OF NEW MEXICO
OFFICE OF THE ATTORNEY GENERAL



RAÚL TORREZ
ATTORNEY GENERAL

October 26, 2023

Sent via Electronic Mail Only

Honorable Gerald Byers
District Attorney
Third Judicial District Attorney's Office
Email: gbyers@da.state.nm.us

RE: Prosecutorial Review of April 16, 2022, shooting of Ms. Amelia Baca by Officer Jared Cosper, Las Cruces Police Department

Dear District Attorney Byers:

As per your request, the New Mexico Office of the Attorney General has conducted a review of the fatal shooting of Ms. Amelia Baca on April 16, 2022, for potential prosecution. We comprehensively reviewed all available evidence including, police reports, witness statements, videos, and photographs. Additionally, we sought assistance from Steve Ijames, a nationally recognized expert in the field of police officer use of force, who has reviewed approximately 3,000 use-of-force cases.

Mr. Ijames provided a thorough and detailed report concluding that Officer Cosper did not use excessive force under the circumstances when he discharged his weapon and shot Ms. Baca. Mr. Ijames recognized that Officer Cosper initially engaged with Ms. Baca in a manner that is not consistent with generally accepted police practices. His tone and manner of communication were inappropriate and likely did not de-escalate the situation. However, Officer Cosper's use of force was in self-defense. Officer Cosper was placed in a position of competing interests. As such, he could not disengage himself from the confrontation with Ms. Baca in light of her use of knives and threats made before he arrived, the knowledge of a barricaded child inside the home, and the physical boundaries of the residence. Ms. Baca's approach toward Officer Cosper with knives in her hands and refusal to comply with repeated commands to drop the knives created a life-threatening situation for the officer.

New Mexico evaluates whether an officer's use of force is excessive under the standard articulated by the United States Supreme Court in *Graham v. Connor*, 490 U.S. 386 (1989). *See State v. Ellis*, 2008-NMSC-032, ¶ 25; *see also* NMSA, 1978, § 30-2-6 (1989) (defining justifiable homicide by a public officer). As explained by Mr. Ijames, Officer Cosper's actions

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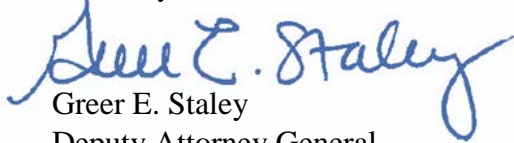
were consistent with a lawful use of force because a peace officer may justifiably use deadly physical force when threatened with serious harm or deadly force. This inquiry is an objective standard, viewed from the perspective of the officer at the time of the incident with the understanding that officers often must make split-second decisions in difficult situations about what type of force is necessary. To hold an officer accountable for the use of excessive force, the State would be required to disprove beyond a reasonable doubt that a reasonable officer would have acted as the officer did under the totality of the circumstances. UJI 14-5173 NMRA. For the reasons explained in Mr. Ijames' report, which is attached to this letter, the State would be unable to meet this standard of proof under the circumstances of this case.

Therefore, we have determined that no criminal charges can be sustained under these circumstances. As such, the New Mexico Office of the Attorney General considers this matter closed.

However, our review is limited to potential criminal liability and does not address any potential disciplinary and/or civil liability issues.

Thank you for contacting the New Mexico Office of the Attorney General.

Sincerely,



Greer E. Staley
Deputy Attorney General
Criminal Affairs

Enclosure: As Referenced Above

cc: Interim Chief Jeremy Story, Las Cruces Police Department, jstory@lascruces.gov
Sheriff Kim Stewart, Doña Ana County Sheriff's Department, kims@donaanacounty.org
File# NMAGO-202210-00523

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6-12-23

Greer Elizabeth Staley
Deputy Attorney General-Criminal Affairs
New Mexico Office of the Attorney General

RE: Amelia Baca case review

Dear Ms. Staley:

On April 10, 2023, you asked me to review information concerning a police interaction that resulted in the death of Ms. Amelia Baca, and offer opinions concerning the police practices involved. I agreed to do so as a non-compensated police practices expert. I was later provided with an external computer drive that contained Dona Ana County Sheriff's Report #2022-00022663 and related material, that documented the use of deadly firearm force by Officer Jared Cosper against Ms. Amelia Baca. A list of the material reviewed is provided at the end of my report.

I reviewed the information, and then reached my conclusions by drawing upon the totality of my knowledge, training, and approximately forty-five police experience. Upon this review and consideration, I offer the following information and opinions.

Incident overview:

On April 16, 2022 at approximately 1834, Jennifer Enriquez called 911 and reported that, "My mother is getting aggressive right now, and she has dementia. I'm hiding in a room because she has threatened to kill me. I don't know if she has weapons from the kitchen, and I have a little one here. I'm with my child. I'm freaking out right now."¹ This resulted in officers being dispatched and provided with the following information via radio:

*"Take a behavioral-Jennifer calling in advising that there is a 75 year old female with dementia, making code 1 threats to the RP, going to be Amelia Baca, she (RP) is hiding in the room with her child, advising that the female is trying to get into the room, does have history of outbursts, looks like the female may have grabbed a knife, she started stabbing the floor with the knife, saying she's going to code 1 the RP, we are still gathering."*²

Officer Jared Cosper was the first officer to arrive. He was interviewed after the interaction with Ms. Baca. I reviewed a video recording of the interview and his perspective of the call for service and what occurred after he arrived. I have provided a non-verbatim summary of what he said transpired below.

¹ 911 call audio, (Extraction 2.1), Clip_1.2)_LCPD202237512.wav.mp3

² LCPD202237512.wav at 9:15

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- Cosper was giving his police dog a bathroom break when he heard a disorderly/behavioral call for service from a family member/female in the house, caller was barricaded in the back room trying to keep themselves safe, other subject was being disruptive, breaking things in the house, not sure if same dispatch or shortly after, but the female had armed herself with knives and was stabbing the floor.³
- While driving dispatch put out that they had an open line and could hear nothing but screaming in the background.⁴
- Upon arrival he heard multiple voices and a “tinging” like metal hitting something a number of times. He drew his weapon, thinking the metal sound was possibly knives.⁵
- Cosper announced his presence and waved his hand for people that he could see to step out. An older and younger female exited the door, one of them saying something about “be careful with her”, something else in Spanish I don’t know.⁶
- As he was preparing to ask, “where’s the lady with the knives”, a female stepped between the furniture and I saw two large kitchen knives-one in each hand. He pointed his firearm at her and told the other two females to get out of the way.⁷
- Start giving her commands to drop the knives. One hand on my pistol and one hand pointing down at the knives “drop the knives-drop the knives”. She’s getting more and more agitated; I can tell in her facial expressions. I point at her hands-point at the knives-point down. She’s watching my hands. She threw her shoulders back-raised her chin up. Like “I’m not going to listen to you”, shaking her head no. I continue to tell her to drop the knives. She is still not listening. At that point I can’t remember if she looks down the hallway or transfers the knife first from her left hand into her right hand. She’s holding both knives in her right hand. She’s kind of looking down the hallway-what I’m guessing is the hallway, back into the structure, she starts looking back there and making a weird gesture with her hands, doing this or something, she’s waving like put down or something, I don’t know what she was meaning by that, she then postures back up, throws her shoulders back up, throws her chin back like “what are you gonna do”, and then starts closing distance on me. At that point we were already super close together. She was right inside the door frame. I had the females right behind me yelling, trying to get in front of me, between me and her. So I keep telling them to get back. As she comes forward is she going to attack me-is she going to attack these females? I don’t know what her intentions are. But she is coming at me with the knives. I fired two rounds.⁸

³ Cosper interview video, 3:11-4:23

⁴ Ibid 4:36

⁵ Ibid 6:11

⁶ Ibid 7:07

⁷ Ibid 7:36

⁸ Ibid 9:25

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Detective Kenneth Davis conducted the interview of Officer Cosper following the interaction with Ms. Baca. I reviewed the video recording of that interview, and several of the key questions asked and response are documented verbatim below.

Q-Based on what you heard over the radio being dispatched, was it your assumption that there were definitely still other occupants in the interior?

A-Yes.

Q-Do you happen to remember how many or ages that were promoted by dispatch?

A-I think they said it was a very young person that was barricaded, but I don't remember the age of the other people that were supposed to be in the house.

Q-But definitely certain that there were other occupants.

A-Yes.⁹

Q-Do you remember how many commands you gave or approximate time range before the end action?

A-I know that I gave multiple, multiple commands. I know there were breaks when they were telling me she has mental issues, "OK, but you need to step back". Then I would re-address her again. "Drop the knives-drop the knives". I know that I threw in a few vulgar words. With everything that was going on, I wasn't getting a response. She was clearly agitated, but I know that I said it multiple multiple times. Time frame in my mind was like I was there for 5 minutes.¹⁰

Q-Between the time when you commenced to give the verbal commands, between that time and just prior to her closing distance on you, what would say the distance ranges were between you?

A-Maybe 5-7 feet.¹¹

Q-And in that same time frame, was there a consideration to altering your approach or changing method?

A-I had thought about trying to create distance myself, by trying to back up-but I had the females right there that were trying to get between me and her. I didn't feel comfortable trying to back up into them. I also didn't want to lose sight of where she was at, because I didn't know if she was going to go down the hallway. She was making those looks down the hall. My consideration was she was still armed, is she going to take out her aggression on someone barricaded in the back room, so I didn't feel comfortable leaving the area that I had already taken over, and with the two females behind me I didn't think it was even an option to start backing up at any point at all.¹²

Q-The two females that were preventing that, how close would you say they consistently were?

⁹ Ibid 15:53

¹⁰ Ibid 16:59

¹¹ Ibid 17:30

¹² Ibid 18:24

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A-From what I could tell-I don't remember looking at them specifically, they were within two to three feet on my right-side.¹³

Q-And once the female on the interior of the house, when she proceeds to close distance on you, about how close does she get to you do you believe?

A-I would say within 3-4 feet.¹⁴

Q-At that point when she begins to close distance on you, you were concerned not only for yourself but the two people that were beside you, correct?

A-That's correct.¹⁵

Q-Do you remember like just before them closing distance, anything else that they might have said or ---to intervene or anything?

A-With me yelling, at her, I know that she was saying something, I could see her saying something but I couldn't make out what it was, and with her screaming (gestures to his right), I had other officers approaching, at that point, screaming at them to get back, there were all types of things that were being said, I couldn't really make out what was being said, or trying to be communicated or anything like that.¹⁶

Q-At any point during that contact with the female at the doorway. Did she give you any type of movement or anything to make you perceive that she was going to comply with any of the orders that you were giving her?

A-It looked, when she transitioned the knives to the right hand, kind of changed her body posture a little bit, started giving whatever gesture it was (hand gesture), like, Ok, I thought, "I understand, I understand, I'm gonna put them down". Then instantly, again, shoulders back, chin up, challenging. I thought maybe at that point, she might do something. But then she immediately changed again.¹⁷

Body Worn Camera (BWC) review:

I reviewed the body worn camera video footage¹⁸ from Officer Cosper, who arrived at the call for service location in response information that was provided by dispatch and outlined above. The BWC video shows that the initial contact point is at the covered walkway, which leads to a 90-degree alcove entry area.

¹³ Ibid 18:43

¹⁴ Ibid 18:55

¹⁵ Ibid 19:13

¹⁶ Ibid 19:44

¹⁷ Ibid 20:28

¹⁸ (Extraction_1.1)2.825_Fir)

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01:16

Initial approach to the contact/entry area.¹⁹

¹⁹ Ibid at 1:16

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01:18
Upon reaching the corner, Officer Cosper could see family members through the screen door.²⁰

²⁰ Ibid 1:18

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He gestured and asked, “can you guys’ step outside for me”?²¹

²¹ Ibid 1:20

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Two family members exited. The second one saying, "Please be very careful.....the rest of her statement cannot be clearly heard on the video, but it is believed based on Cosper's interview statement that she mentioned her grandmothers mental (dementia) condition.

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Ms. Baca then immediately stepped into view, holding two knives.²²

²² Ibid 1:27

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Officer Cosper gave multiple and continuous orders for Ms. Baca to “drop the knives” during the interaction.

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Ms. Baca appeared to be “looking down the hall” as referenced by Cosper during his post shooting interview.

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Family members were visible to the right of Cosper, as he was giving orders to them to “back up-back up now”.

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Additional commands being given to Ms. Baca to drop the knives.

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Ms. Baca turns, looks, and gestures “down the hall”.

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Ms. Baca gestures towards Officer Cosper following his commands, and then transfers a knife to her right hand.

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Ms. Baca begins taking steps towards Officer Cosper from the edge of the couch. The New Mexico State Police crime scene diagram (page 12) places the couch edge 9 feet 5 inches from the wall that is directly behind Officer Cosper.

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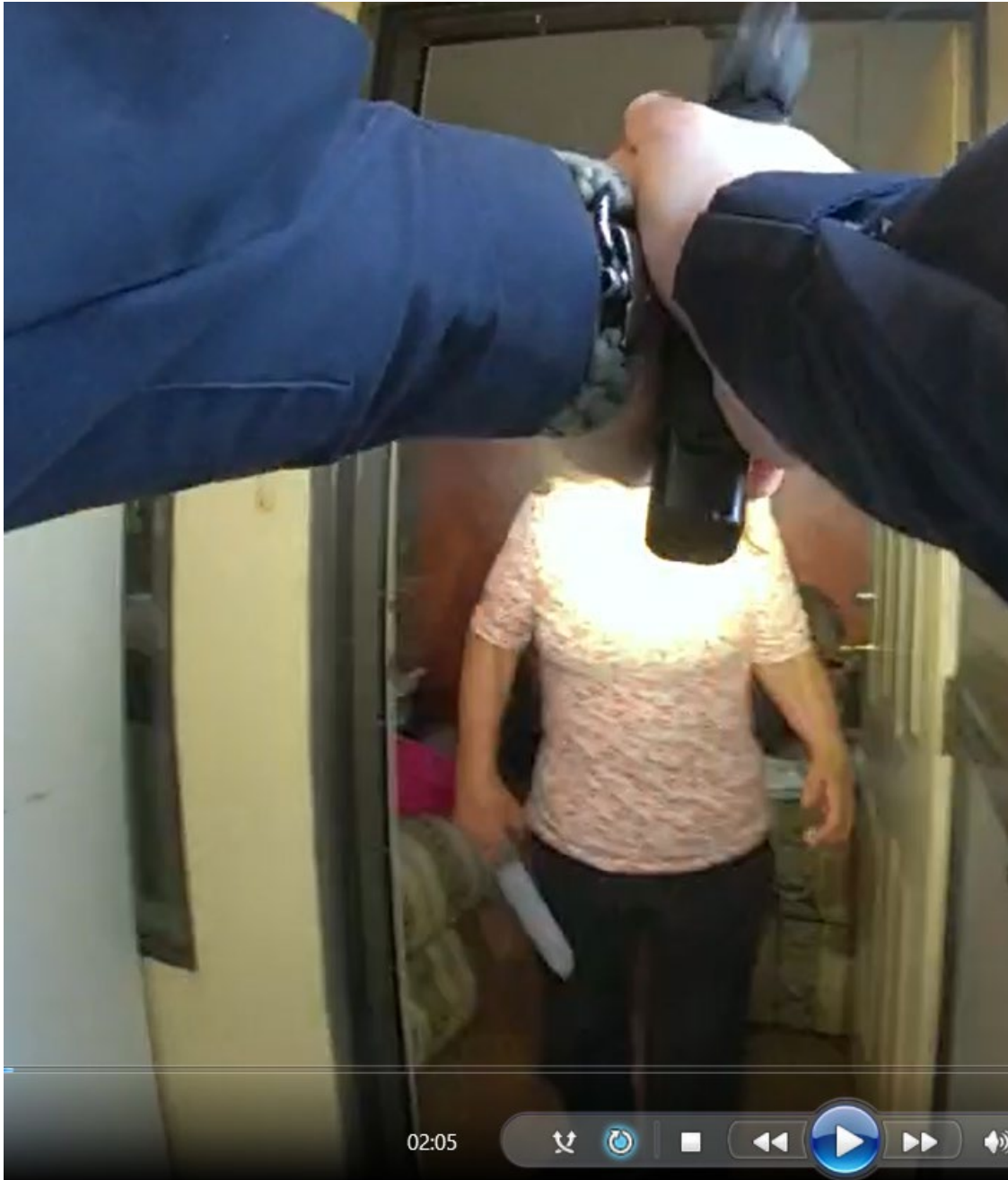
Ms. Baca continues to take steps towards Officer Cosper.

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Continuation of the steps towards the officer.

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Ms. Baca continues her advance to the threshold of the door. This position (based on the state police diagram) places her 6 feet 11 inches from the wall that is directly behind Officer Cosper.²³

²³ Telephone conversation with Agent Norris on May 31, 2023

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The point at which the shots were fired.

During the thirty-nine seconds that Officer Cosper interacted with Ms. Baca he issued the following commands:

- “Put it down-Put it down now” (1:27)
- “Back up-Back up” (this in apparent reference to the two family members who exited and who are on his right, at the corner of the alcove-1:32).
- “Drop the knife-drop the knife” (1:37)
- “OK-back up, back up now” (again, in apparent reference to the two family members who are on his right, at the corner of the alcove-1:39).
- “Drop the knife, drop the fucking knife” (1:44).
- “Drop the knife-do it now” (1:46).
- “Drop the fucking knife-do it now” (1:46).
- “Drop the fucking knife, do it now, put it on the ground, put it down now” (1:56).
- “Put it down-Put the fucking knife (shots fired) down” (2:06).

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Opinions

Opinion 1:

The emergency response to this call for service was consistent with generally and or commonly accepted police practice, and with that of prudent, experienced, and professionally trained police officers facing these or similar circumstances.

Basis for opinion 1:

The material provided and reviewed indicates that this call for service involved an elderly female family member with dementia, who was armed with knives and creating a potential deadly threat for others inside the home-to such a degree that the caller and other family members had barricaded themselves inside their rooms. Accordingly, officers responded in emergency fashion to ensure that they could interact and protect those who were in potential danger.

Opinion 2:

The initial citizen contact, separate, and focus effort put forth by Officer Cosper was consistent with generally and or commonly accepted police practice, and with that of prudent, experienced, and professionally trained police officers facing these or similar circumstances.

Basis for opinion 2:

Officer Cosper was responding to a call for service that potentially involved deadly jeopardy for the caller, others inside the home, and police officers. Upon arrival he immediately took steps to contact the persons involved, separate them to determine where the “threat” (armed person) was, and then focus on/address the danger as necessary and appropriate. He did this by calling and gesturing to the persons he saw and heard inside the



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entry area, who were responsive to his request to exit. The first person exited at 1:25, the second at 1:26, and in that same “second” (1:26) Ms. Baca appeared following her to the threshold opening with a knife in her hand. Officer Cosper reacted to this within



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one second (1:27 on the video) as he initiated the focus process, by drawing his firearm and ordering Ms. Baca to “set it down”.



Opinion 3:

The secondary (focus) phase of interacting with Ms. Baca—specifically the tone and manner of communication—was inconsistent with generally and or commonly accepted police practice, and with that of prudent, experienced, and professionally trained police officers facing these or similar circumstances.

Basis for opinion 3:

Officer Cospers verbally interacted with Ms. Baca using loud, repetitive, and profane commands. The initial dispatch information and brief family contact upon arrival indicated that Ms. Baca was effected with mental illness, dementia, and or was a person in crisis and accordingly, there are methods of communicating with such persons that increase the probability of positive outcomes—and they can be done while covering armed subjects and without compromising officer safety.

The International Association of Chiefs of Police (IACP) National Policy Center, Model policy addressing response to persons in crisis and communication emphasizes such things as:

- Take steps to calm the situation.
- Assume a quiet, nonthreatening manner when approaching or conversing with the individuals.
- Move slowly and do not excite the individual.

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- Provide reassurance that officers are there to help and that the individual will be provided with appropriate care.
- Ask the individual's name or by what name they would prefer to be addressed and use that name when talking with the individual.
- Communicate with the individual in an attempt to determine what is bothering them.
- If possible, speak slowly and use a low tone of voice.
- Reminds officers to take steps to calm the situation.²⁴

The Florida State University has a program entitled Dementia Resources for First Responders (FSU REACH)²⁵, which emphasizes the following when communicating with persons effected by dementia:

- Use short, simple sentences and use body language and facial expressions to calm the person.
- Calm the environment. Keep noise and distractions to a minimum.

Street Cop Training offers a program entitled “An Overview of Dementia and How to Interact with Those Affected”²⁶, which encourages officers to:

- Explain who you are, and that you are there to help.
- Maintain a calm and friendly demeanor and voice. Remember to smile.

Officer Cosper had completed a 40-hour Crisis Intervention Team (CIT) training program in 2016.²⁷ I am an instructor in the CIT basic and advanced programs and am familiar with their course curriculums. CIT is not heavily weighted in response to dementia situations, but the communication protocols provided in the course are consistent with the ones referenced above and are generally applicable to interacting with a person affected with dementia and or a person in crisis.

Generally and or commonly accepted police training, policy, and practice prohibits officers from using rude or profane language when interacting with citizens. Some have argued that at times it is appropriate and even necessary for officers to “get down to a certain level” to emphasize the seriousness of a situation. Most police leaders and trainers disagree with this. Noted defensive tactics instructor Gary Klugiewicz says that profanity can “set someone off,” make an officer appear unprofessional and uncontrolled, and have a negative impact on court proceedings.²⁸ I agree.

²⁴ MentalIllnessPolicy2018.pdf (theiacp.org), procedures IV, C-response to person in crisis

²⁵ Dementia Resources for First Responders | FSU REACH

²⁶ An Overview of Dementia and How To Interact With Those Affected | Street Cop Training

²⁷ Cosper training certificate file

²⁸ Klugiewicz, G. (2005, July). Should you swear at suspects? Retrieved from <https://www.policeone.com/legal/tips/117522-Should-you-swear-at-suspects/>.

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New Mexico Demographics reports that Las Cruces is a largely Hispanic (61.8%) community.²⁹ With such a significant percentage of the residents likely to speak and or be familiar with the Spanish language, it would seem reasonable and appropriate for all Las Cruces officers be trained to speak certain key phrases in Spanish, to assist with de-escalating persons in crisis-especially when it appears that critical commands (such as “hello-please put down the knife”) in English are not being followed.

In conclusion, the police were called because Ms. Baca was acting in a way that caused some family members to barricade inside the home, and others to flee by jumping out of windows. When the police arrived, she was mobile, armed with two large knives, and less than ten feet away. Beyond question this was a tense, uncertain, rapidly evolving, and potentially deadly situation. In consideration of the totality of these circumstances, Officer Cospers still made the appropriate decision to try and communicate with Ms. Baca, in hopes of getting her to put down the knives and resolve the situation without anyone being injured. Regretfully, the manner of communication that followed in the limited time available was inconsistent with what has proven most likely to result in a positive outcome in these or similar situations.

Opinion 4:

The deadly force used by Officer Jared Cospers against Ms. Amelia Baca was in self-defense, was consistent with generally and or commonly accepted police practice, and was consistent with that of prudent, experienced, and professionally trained police officers facing these or similar circumstances.

Basis for opinion 4:

In assessing whether the basis to use deadly force in this case was objectively reasonable, the totality of circumstances presented should first be viewed in the context of the key factors referenced under *Graham v. Connor*.³⁰

- The severity of the crime involved:

Based on the information provided and reviewed, Ms. Amelia Baca was armed with a large knife and advancing towards Officer Jared Cospers from a distance of less than seven feet when the shots were fired. Officer Cospers was pointing his firearm at Ms. Baca at that time, had given her multiple commands, and was giving her control commands at the moment he discharged his weapon. Accordingly, a prudent, experienced, and professionally trained police officer facing these or similar circumstances would have reasonably believed this action to be an attempt to cause death or serious physical injury.

- The immediate threat to the safety of officers or others:

A prudent, experienced, and professionally trained police officer facing these or similar circumstances would have reasonably believed that he was in immediate danger of

²⁹ Las Cruces Demographics - Get Current Census Data for Las Cruces, NM (newmexico-demographics.com)

³⁰ 490 U.S. 386 (1989)

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death or serious physical injury from the armed advance-and that others on scene would be in immediate danger unless the armed action was stopped immediately.

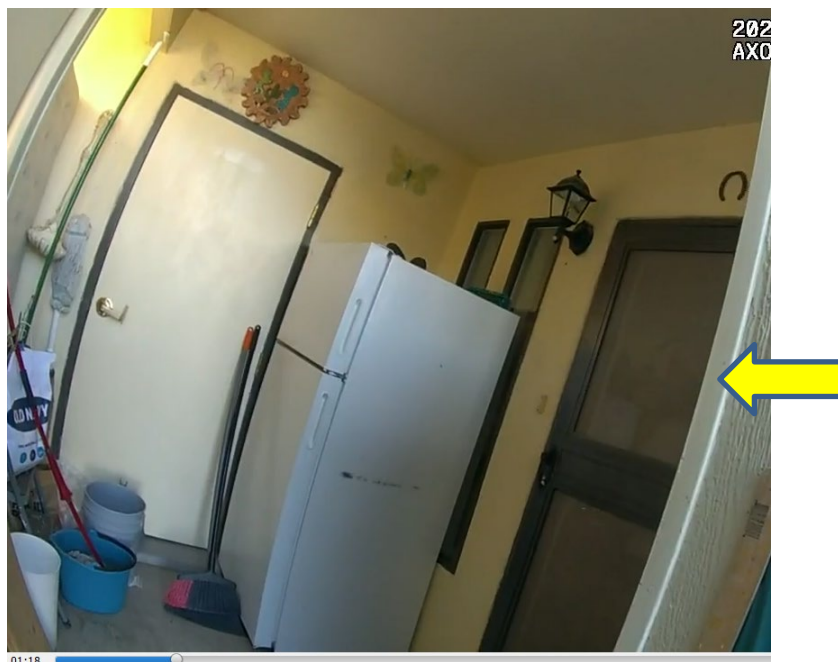
- The suspect actively resisting seizure:

Ms. Baca was armed and had actively resisted all commands to put down the weapons, and as such was resisting control and seizure.

In consideration of the totality of circumstances referenced above, a prudent, experienced, and professionally trained police officer would have reasonably believed that the key factors in *Graham v. Connor*³¹ had been met, and that he was in immediate danger of death or serious physical injury. Accordingly and consistent with generally and or commonly accepted police training, policy, and practice, Officer Jared Cospers used deadly firearm force in self-defense.

In addition to considering the basis for using deadly force in the context referenced above, it is also important and necessary to consider officer positioning-which was the key factor in the need to use deadly force in self-defense.

Officer Jared Cospers interacted “face to face” with Ms. Amelia Baca at a distance of less than 9.5 feet for approximately 39 seconds.³² He was initially positioned at the corner of the approaching walkway, where it turned right and faced the entry door (yellow arrows depicted in the photographs below).



³¹ <https://supreme.justia.com/cases/federal/us/490/386/>

³² New Mexico State Police Crime Scene Diagram, page 12

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Ms. Baca was inside the room standing near the end of the couch. Officer Cosper estimated the distance between them was 5-7 feet.³³ The crime scene diagram indicates the distance between them was approximately six feet. There is no national standard or policy on “how close is too close” for an officer when interacting with a person armed with an edged weapon.³⁴ Likewise, there is a considerable body of knowledge that suggests the distances in this case would have caused a prudent, experienced, and professionally trained police officer to reasonably believe they were in immediately deadly jeopardy from an advancing subject. In consideration of that reality, why would a prudent, experienced, and professionally trained police officer remain in that position?

Police officers make decisions in critical incidents based on safety prioritization. The National Tactical Officers Association (NTOA) defines Safety Priorities as:

*Safety priorities A decision-making process which provides the framework for making tactically sound decisions, utilizing objective criteria based on an individual’s current or likely risk of suffering serious bodily injury or death and their direct ability to remove themselves from that danger. Those exposed to the greatest potential of injury with the least ability to escape the situation are placed at the top of the priorities, i.e. a hostage is at grave danger of injury when held against their will and has little ability to control their situation. On the other end of the continuum is the suspect, who has little threat of injury and absolute control over the situation. The safety priorities value all life and its sole intent is to assist law enforcement in making tactical decisions to assist in saving lives.*³⁵

In simplistic terms, officers arrive on an elevated risk call such as the immediate case, and their “safety priority” becomes the persons in immediate danger—who are not causing the danger. In this case that would have been the people inside the home with Ms. Baca. Accordingly, Officer Cosper immediately began getting people out of the house and

³³ Cosper interview

³⁴ The 21-foot “Rule” is Back in the News! - Force Science, www.pbs.org/wgbh/frontline/article/21-foot-rule-controversial-police-training-shootings/, www.police1.com/officer-safety/articles/research-why-21-foot-is-not-a-safe-distance-hqhPkS6wViECV6Fq/

³⁵ [swatstandards.pdf\(ntoa.org\)](http://swatstandards.pdf(ntoa.org)), definitions page 45

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attempting to disarm Ms. Baca. Unfortunately, the two ladies who exited the house remained in very close proximity to the right of Cospers and were physically interacting with him to some degree as documented on the video. Cospers also believed that there was at least one other young person still barricaded inside the house, and that Ms. Baca looking “down the hall” might be an indication she was going to aggress towards them.³⁶

Cospers was asked during his interview about altering his approach or changing his method. He replied as follows:

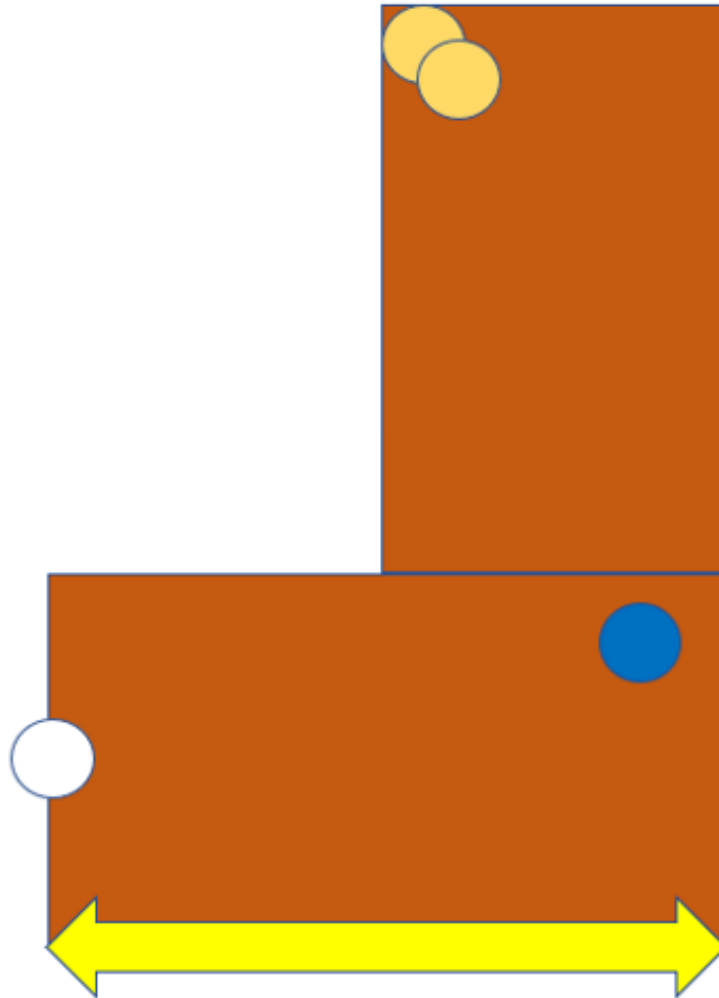
A-I had thought about trying to create distance myself, by trying to back up-but I had the females right there that were trying to get between me and her. I didn't feel comfortable trying to back up into them. I also didn't want to lose sight of where she was at, because I didn't know if she was going to go down the hallway. She was making those looks down the hall. My consideration was she was still armed, is she going to take out her aggression on someone barricaded in the back room, so I didn't feel comfortable leaving the area that I had already taken over, and with the two females behind me I didn't think it was even an option to start backing up at any point at all.³⁷

A review of the second arriving officer BWC video indicates that the two females had been pulled back and away from Cospers seconds before the shots were fired, but there is nothing to indicate that he was aware of that. Likewise, had he been aware that they had been pulled back, his obligation to keep his eyes on Ms. Baca to ensure that she didn't go back down the hallway and endanger people inside prevented him from moving out of a position of observation. During the interaction Cospers did move from his original position near the “corner” away from Ms. Baca, and backed up as far as he possibly could against the wall directly across from doorway opening.

³⁶ Cospers interview video

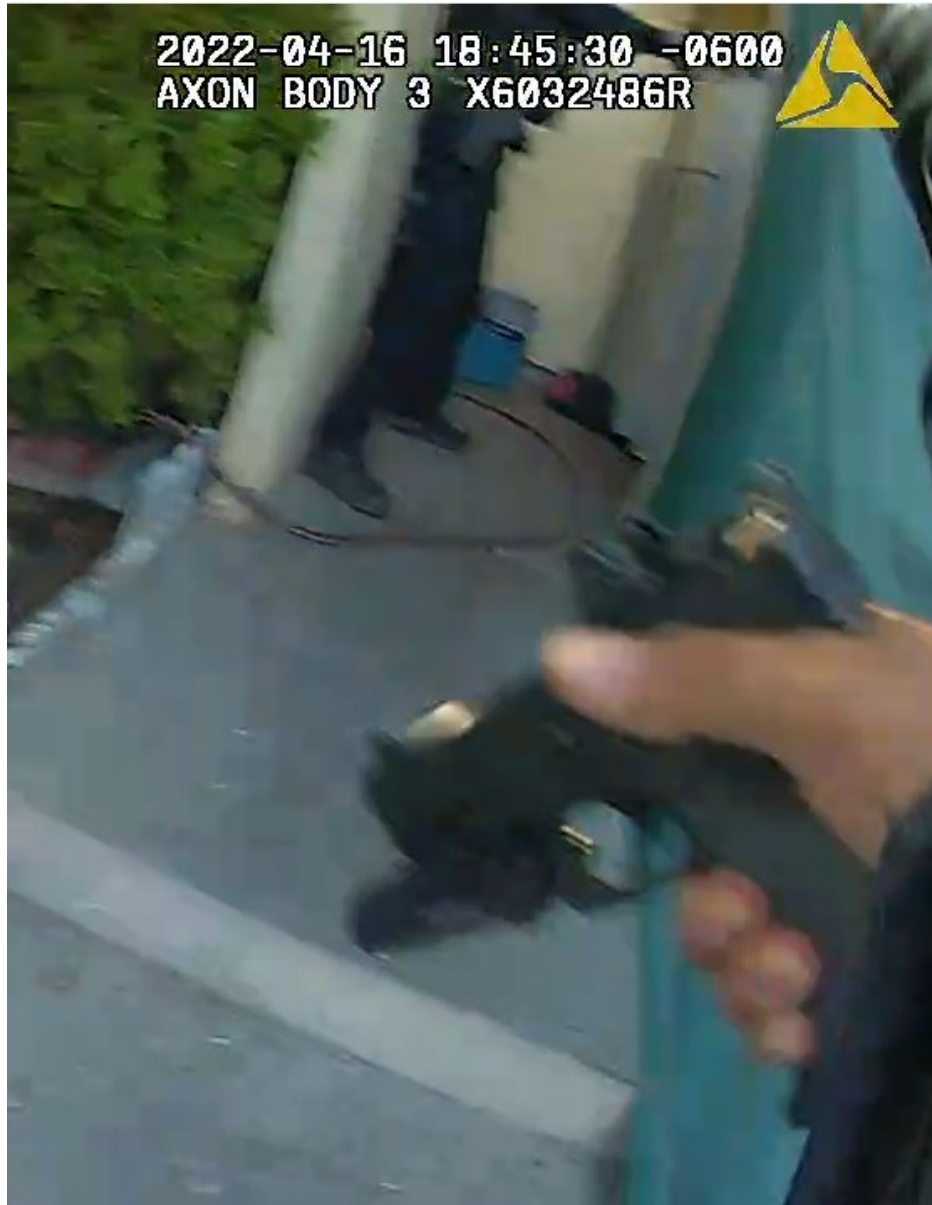
³⁷ Ibid 18:24

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This graphic depicts the approximate positions of Ms. Baca (white circle), Officer Cospier (blue circle), and the daughter and grand daughter (beige circles) at the time of the shooting. The yellow arrow indicates the space between the threshold of the door and the wall that Cospier was backed against. The crime scene diagram indicates the distance is 6 feet 11 inches.

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Cosper at the time of the shooting. His back is against the wall directly across from Ms. Baca, who is at the threshold of the door.

³⁸ Ibid at 1:11

Steve Ijames
Police Training and Consultation

In conclusion, Officer Jared Cospers interacted with Ms. Amelia Baca for 39 seconds, during which time he had to process a number of competing priorities. He had to interact with two additional family members who were initially in physical contact with him to his right, and his concern for their involvement and potential safety if Ms. Baca advanced. He had to consider the implications of Ms. Baca “looking down the hall” several times, and what that meant for the safety of the young person he believed was still barricaded inside-should Ms. Baca move out of view and in that direction. He had to keep his eyes on Ms. Baca who was armed with two large knives, was non-compliant, and was never more than 9 feet 5 inches from him-while considering his own safety should she advance from such a close position. As a result, it was reasonable for him to remain in his position of observation and cover, consistent with generally and or commonly accepted police safety prioritization and practice, and consistent with that of prudent, experienced, and professionally trained police officers facing these or similar circumstances.

Respectfully submitted.

A handwritten signature in black ink, appearing to read "S. Ijames". The signature is stylized with a large, looped initial "S" and a cursive "Ijames" following it.

Steve Ijames